

EXHIBIT 8

ROBINS  KAPLAN LLP

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Soren Stevenson
2717 East 22nd Street
Minneapolis, MN 55406

Date: March 31, 2022
File Number: 129949.0000
Attorney: R. Bennett
Terms: 30 Days

RE: Stevenson, Soren v. City of Minneapolis; John Doe

Professional Services & Expenses:

Legal Fees	\$1,481,258.00
Legal Expenses	\$31,934.60
Total Amount Due	<hr/> \$1,513,192.60 <hr/>

Robins Kaplan Contacts:

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Date	Timekeeper	Description	Hours	Fees
06/02/20	R. Bennett	Soren STEVENSON: Telephone conference with attorney R. Kreps, referring counsel and long term Stevenson family friend	0.70	\$598.50
06/03/20	R. Bennett	SOREN STEVENSON: Review WCCO video.	0.30	\$256.50
06/04/20	R. Bennett	STEVENSON: Telephone conference with R, Kreps.	0.40	\$342.00
06/05/20	R. Bennett	SOREN STEVENSON: Telephone conference with R. Kreps.	0.60	\$513.00
06/08/20	R. Bennett	SOREN STEVENSON: Telephone conference with R. Kreps [.5]; telephone conference with Katie Bennett [.3]; telephone conference with Nick Adler re new client[.3].	1.10	\$940.50
06/08/20	K. Bennett	telephone conference with RB re: new client [.3]	0.30	\$205.50
06/09/20	R. Bennett	Attend Zoom meeting with client [1.0]; telephone conference with Katie Bennett [.3]; telephone conference with Andy Noel re new client [.3]; telephone conference with Katie Bennett x2 re interview [.4]; review meeting notes [.4]; review file opening memo [.4].	2.80	\$2,394.00
06/09/20	A. Noel	Prepare for and attend telephone conference with client and Ronn Kreps and team.	1.50	\$1,095.00
06/09/20	A. Noel	telephone conference with RB re: new client [.3]	0.30	\$219.00
06/09/20	K. Bennett	telephone conference with RB re: new client and next steps[.7]; zoom mtg with client/RB/AJN/R. Kreps [1.0]	1.70	\$1,164.50
06/09/20	N. Adler	Soren Stevenson - Client meeting with potential new client Soren Stevenson [1.0]; Research media for incident [2.0]	3.00	\$660.00
06/10/20	R. Bennett	Telephone conference with Katie Bennett and Andy Noel re: next steps	0.50	\$427.50
06/10/20	A. Noel	telephone conference with RB/KHB re next steps [.5]	0.50	\$365.00
06/10/20	K. Bennett	Draft email to Soren re: retainer, auths, provider list	0.70	\$479.50
06/10/20	K. Bennett	telephone conference with RB/AJN re next steps [.5]	0.50	\$342.50

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06/10/20	A. Koob	Review emails from KHB, review file/notes, and view related videos/articles [.2]; prepare and send authorizations to KHB for client signature [.2].	0.40	\$92.00
06/15/20	R. Bennett	Email N. Adler re investigation [.3]; voice mail from client [.2]; telephone conference with client [.3]; telephone conference with Katie Bennett re next steps [.2]; review Katie Bennett email [.4]; telephone conference with client [.3].	1.50	\$1,282.50
06/15/20	K. Bennett	Discuss plan, updates with civil rights team.	0.30	\$205.50
06/15/20	M. Betinsky	Conference call with CRG re Stevenson matter strategy and next steps in development of record (.3).	0.30	\$159.00
06/15/20	A. Koob	Review multiple emails regarding status and respond to same [.2]; Zoom meeting with RB, AJN, KHB, and MEB to discuss status and strategy [.3].	0.50	\$115.00
06/16/20	R. Bennett	Telephone conference with Katie Bennett/Andy Noel re Go Fund Me [.6]; telephone conference with Ronn Kreps [.6].	1.20	\$1,026.00
06/16/20	A. Noel	telephone conference with RB/KHB re: GoFundMe [.6]	0.60	\$438.00
06/16/20	K. Bennett	Review go fund me page, entries, links to you tube and other websites with information re: injuries, etc [.7] Discuss concerns with RB and AJN [.6].	1.30	\$890.50
06/17/20	M. Betinsky	Emails with N. Adler re circumstances surrounding S. Stevenson shooting, review file materials regarding same, and draft and edit letter with photographs to Arradondo and Nilsson concerning same (2.0)	2.00	\$1,060.00
06/17/20	N. Adler	Soren Stevenson - Review and capture still shots of video [1.0]; Correspond with client, correspond with team [.5]	1.50	\$330.00
06/18/20	R. Bennett	Review and revise letter to Nilsson and Arradondo and telephone conference with Marc Betinsky re same [.5]; telephone conference with R. Kreps [.2]; telephone conference with Andy Noel and Marc Betinsky and emails re press conference [.8].	1.50	\$1,282.50
06/18/20	A. Noel	Telephone conference with Bob Bennett re Nilsson ltr	0.70	\$511.00

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Date	Timekeeper	Description	Hours	Fees
06/18/20	M. Betinsky	T/C with RB re letter concerning S. Steveson to MPD/City, edits to letter, and follow-up call re same (.5).	0.80	\$424.00
06/19/20	R. Bennett	Communication with Marc Betinsky re getting correspondence out.	0.30	\$256.50
06/19/20	A. Noel	Review client and team emails and media strategy.	1.00	\$730.00
06/19/20	M. Betinsky	Emails with RB and Soren Stevenson re information needed for letter to Arrandondo and Nilsson, prep authorization to go with same, and oversee sending same (1.4)	1.40	\$742.00
06/20/20	M. Betinsky	Emails re Soren Stevenson injuries.	0.20	\$106.00
06/22/20	R. Bennett	Review client email and Adler email and photos [.6]; review blunt impact projectile specifications of Safariland in detail [.6]; telephone conference with Marc Betinsky [.4]; telephone conference with Andy Noel re same [.3]	1.90	\$1,624.50
06/22/20	A. Noel	Review claim letter and file material [1.0]; telephone conference with Bob Bennett re BIP [.3]	1.30	\$949.00
06/22/20	K. Bennett	Review info re: retainer; update from Nick and evidence collected; review info on the Safariland projectile likely used against Soren.	1.30	\$890.50
06/22/20	M. Betinsky	Email from N. Adler re evidence collected in Stevenson case and research projectile used (.5); conference call with RB (.4)	0.90	\$477.00
06/22/20	N. Adler	Correspond with team [.5]; Travel to Ron Krepps house. Social distant meeting with Krepps and Soren Stevenson and 2 witnesses. Retrieve evidence. Process and store evidence at Warehouse. Travel. [5.0]	5.50	\$1,210.00
06/23/20	R. Bennett	Email client [.3]; review evidence [.3].	0.60	\$513.00
06/24/20	R. Bennett	Telephone conference with Sarff.	0.30	\$256.50
06/25/20	R. Bennett	Contact - email - voice mail with and from K. Sarff Mpls. City Atty's Office [1.5]; revise letter to Evans [.3].	1.80	\$1,539.00
06/25/20	M. Betinsky	Prepare and submit data practices act request to city; emails re same.	0.40	\$212.00

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Date	Timekeeper	Description	Hours	Fees
07/01/20	R. Bennett	Telephone conference with Marc Betinsky [.3]; review Drew Evans letter [.3]; correspondence to client [.4]; review email from client [.3].	1.30	\$1,111.50
07/01/20	M. Betinsky	Emails re BCA letter [.2]; conference with RB [.3]	0.50	\$265.00
07/02/20	A. Noel	Email correspondence with team and client.	0.50	\$365.00
07/09/20	R. Bennett	Telephone conference with Ronn Kreps [.3]; telephone conference with Sarff [.2]; review file and media [.8].	1.30	\$1,111.50
07/13/20	R. Bennett	Respond to Sarff.	0.30	\$256.50
07/14/20	R. Bennett	Telephone conference with K. Sarff [.3]; telephone conference with Katie Bennett and Marc Betinsky re tactics and review Washington Post piece on 40 mm misuse [.7].	1.00	\$855.00
07/14/20	K. Bennett	telephone conference with RB/MEB re: tactics/Washington post piece [.4]	0.40	\$274.00
07/14/20	M. Betinsky	telephone conference with RB/KHB re: tactics/Washington post piece [.4]	0.40	\$212.00
07/15/20	R. Bennett	Conference with team and telephone conference with Soren [1.0]; conference call with Andy Noel, Katie Bennett and Marc Betinsky [.2]; telephone conference with Marc Betinsky re research of enforceability of MPD policies re use of force and action plan [.2]; review memo [.2];	1.60	\$1,368.00
07/15/20	A. Noel	telephone conference with team re Storms emails [.2]	0.20	\$146.00
07/15/20	K. Bennett	telephone conference with team re Storms emails [.2]	0.20	\$137.00
07/15/20	M. Betinsky	Research re enforceability of policy modifications at MPD re use of force and emails CRG re same (1.7); emails regarding GoFundMe (.3); conference call RB and KHB re GoFundMe and next steps to take re same (.2).	2.20	\$1,166.00
07/16/20	R. Bennett	Review Fluegel's memo on GoFundMe.	0.40	\$342.00
07/16/20	M. Betinsky	Email RB re City response to identification requests re shooter (.1); email RB re potential RICO claims vis-a-vis union and begin review of article concerning same (.6); emails re GoFundMe (.3).	1.00	\$530.00

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07/17/20	R. Bennett	Review Marc Betinsky's RICO memo.	0.30	\$256.50
07/20/20	R. Bennett	Telephone conference with Brad Murkens FBI [.3]; review communication history [.4].	0.70	\$598.50
07/21/20	R. Bennett	Review and consider pertinent MPD policies and options with Marc Betinsky and Katie Bennett [1.0]; telephone conference with Ronn Kreps [.3]; review Katie Bennett MPD policies memo [.5]; telephone conference with Katie Bennett [.2].	2.00	\$1,710.00
07/21/20	K. Bennett	Call with RB/MEB re: next steps (sue out/research assignments) [.5] MPD policy and procedure review + draft memo to civil rights team re: same (identification of officers, reports should exist) [1.5].	2.00	\$1,370.00
07/21/20	M. Betinsky	Conference call with RB/KHB re MPD officer identification, relevant MPD policies re same, and strategies for identifying shooting officer (.5); review KHB memo re relevant MPD policies and research re officer failure to identify, emails re same (.8); emails N. Adler re video of shooting and prep for media attention and T/C RB re same (.4).	1.70	\$901.00
07/22/20	R. Bennett	Email Katie Bennett re additional MPD BWC policies [.3]; review Marc Betinsky email [.2]; review Katie Bennett revised memo [.5]; telephone conference with Katie Bennett re expert issue [.3]; telephone conference with Jack Ryan [.3].	1.40	\$1,197.00
07/22/20	K. Bennett	Continue review of MPD policies; begin drafting letter re: identities of officers to Minneapolis City Attorney's office [2.0]	2.00	\$1,370.00
07/22/20	K. Bennett	telephone conference with RB re: BWC expert issues [.3]	0.30	\$205.50
07/22/20	M. Betinsky	Send and review mails re MPD policies.	0.30	\$159.00
07/22/20	N. Adler	Download photos and video, correspond with M. Betinsky.	1.00	\$220.00
07/23/20	R. Bennett	Conference with Marc Betinsky and Katie Bennett re action plan [.5]; review/revise letter to Sarff [1.0].	1.50	\$1,282.50
07/23/20	A. Noel	Review early draft letter [.6] and discuss same [.4].	1.00	\$730.00
07/23/20	K. Bennett	Continue drafting letter to Sarff [2.5] Review Projectile policy [1.0].	3.50	\$2,397.50

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07/23/20	M. Betinsky	Conference with CRG re next steps (.2); T/C with Paul McCaffrey re video of shooting (.2).	0.40	\$212.00
07/24/20	R. Bennett	Review and revise letter to Nilsson and Sarff [.6]; conference with Andy Noel re same [.4]; details re distribution [.5]; telephone conference with media [1.0].	2.50	\$2,137.50
07/24/20	A. Noel	telephone conference with RB re: Nilsson and Sarff ltr [.4]	0.40	\$292.00
07/24/20	K. Bennett	Review edits to Sarff letter by MEB and RB; edit letter and email out for further discussion with RB.	0.50	\$342.50
07/28/20	R. Bennett	Review Mpls. initial response.	0.40	\$342.00
07/28/20	K. Bennett	Emails re: starting lawsuit.	0.20	\$137.00
07/29/20	R. Bennett	Review 609.066/telephone conference with Marc Betinsky [.4]; review emails re medicals [.4].	0.80	\$684.00
07/29/20	A. Noel	telephone conference with RB re: 609.066 [.4]	0.40	\$292.00
07/29/20	K. Bennett	Review MPD report info; review file and discuss plan with regard to records requests with ATK [1.0]Correspondence with Soren re: treating providers and authorizations [.6].	1.60	\$1,096.00
07/29/20	A. Koob	Review emails from KHB regarding records requests and respond to same [.2]; review signed authorizations from client, save same to electronic file and submit requests for medical and billing records [.5]; create request index and billing index [.3]; email to client regarding Dr. Holt for additional information on affiliated facility and review response from client regarding same[.1].	1.10	\$253.00
08/01/20	A. Noel	Work on complaint.	2.80	\$2,044.00
08/03/20	R. Bennett	Conference with civil rights team re complaint and action plan.	0.50	\$427.50
08/03/20	A. Noel	Telephone conference with team re: complaint issues	0.50	\$365.00
08/04/20	R. Bennett	Telephone conference with Katie Bennett re complaint issues.	0.40	\$342.00
08/04/20	A. Noel	Drafting complaint.	2.00	\$1,460.00

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08/04/20	K. Bennett	Draft MPD launcher policy section of complaint and email to AJN.	0.80	\$548.00
08/04/20	K. Bennett	telephone conference with RB re: complaint [.4]	0.40	\$274.00
08/05/20	A. Noel	Work on complaint.	1.50	\$1,095.00
08/06/20	R. Bennett	Telephone conference with Andy Noel re complaint.	0.50	\$427.50
08/06/20	A. Noel	telephone conference with RB re: complaint [.5]	0.50	\$365.00
08/07/20	R. Bennett	Telephone conference with Andy Noel re complaint.	0.40	\$342.00
08/07/20	A. Noel	telephone conference with RB re: complaint [.4]	0.40	\$292.00
08/09/20	A. Noel	Drafting complaint.	2.10	\$1,533.00
08/11/20	R. Bennett	Conference with Andy Noel.	0.40	\$342.00
08/11/20	A. Noel	telephone conference with RB re: complaint [.4]	0.40	\$292.00
08/12/20	R. Bennett	Review Guardian article.	0.50	\$427.50
08/12/20	A. Noel	Work on complaint.	5.50	\$4,015.00
08/14/20	R. Bennett	Preview draft complaint.	1.00	\$855.00
08/14/20	M. Betinsky	Review draft complaint/facts.	0.60	\$318.00
08/17/20	A. Noel	Review and revise complaint.	1.70	\$1,241.00
08/19/20	R. Bennett	Telephone conference with client re complaint, Gofund me, options re career; case strategy and non-monetary relief.	1.00	\$855.00
08/21/20	R. Bennett	Review draft complaint.	0.60	\$513.00
08/21/20	A. Noel	Review medical.	1.70	\$1,241.00
08/21/20	A. Koob	Review email from D. Roisum regarding MHealth records request and approval for records fee and email to KHB and RB to get approval for amount, review of records requests to confirm requests for imaging and email response to D. Roisum regarding approval of records costs.	0.20	\$46.00
08/27/20	R. Bennett	Emails x3 to/from client.	0.80	\$684.00

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08/28/20	A. Noel	Update and draft complaint.	1.20	\$876.00
08/28/20	A. Koob	Review of Brave Choices medical records and prepare summary of same [3.6]; review billing records from Brave Choices and update billing index, email summary and updated information to KHB and AJN [4].	4.00	\$920.00
08/31/20	A. Koob	Emails to/from D. Roisum regarding imaging CD.	0.10	\$23.00
09/01/20	R. Bennett	Review case development strategy with Andy Noel.	0.50	\$427.50
09/02/20	R. Bennett	Telephone conference with Andy Noel re timing and contacts.	0.80	\$684.00
09/02/20	A. Noel	Drafting complaint [7] and telephone conference with Bob Bennett re info from Sarff [8]	1.50	\$1,095.00
09/02/20	M. Betinsky	Email re Soren's attendance at George Floyd discussion.	0.10	\$53.00
09/03/20	R. Bennett	Telephone conference with Sarff [7]; telephone conference with CR team re status update [5]; telephone conference with client re public statements [6]; review Katie Bennett notes [4].	2.20	\$1,881.00
09/03/20	A. Noel	Review imaging and other medical for input into complaint.	1.50	\$1,095.00
09/03/20	A. Noel	conference with team re status update [5]	0.50	\$365.00
09/03/20	K. Bennett	Review MPD policy and procedure manual, brainstorm re: identification discovery needed and draft memo re: same [1.8]Update from Bob re: information on BWC evidence from City [4].	2.20	\$1,507.00
09/03/20	K. Bennett	conference with team re status update [5]	0.50	\$342.50
09/03/20	M. Betinsky	Conference call CRG re contact from City Attorney's Office, new information for Complaint and strategy going forward (.5); review KHB memo re policies and other information that should allow identification of involved officer(s) (.2).	0.70	\$371.00
09/03/20	A. Koob	Email to/from KHB regarding imaging CD from M Health received and status of download, email to AJN regarding same.	0.10	\$23.00
09/04/20	M. Betinsky	Brief review of draft complaint.	0.40	\$212.00

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09/04/20	A. Koob	Review imaging CD from M Health, download imaging to electronic file, update index and email AJN regarding available imaging for his review.	0.30	\$69.00
09/08/20	R. Bennett	Telephone conference with Andy Noel and Marc Betinsky re complaint issues.	0.60	\$513.00
09/08/20	A. Noel	telephone conference with RB/MEB re: complaint issues [.6]	0.60	\$438.00
09/08/20	M. Betinsky	telephone conference with RB/MEB re: complaint issues [.6]	0.60	\$318.00
09/10/20	M. Betinsky	Email re additional info for Complaint and begin "hard review" of draft Complaint.	0.70	\$371.00
09/11/20	M. Betinsky	Continue "hard review" of draft Complaint.	0.50	\$265.00
09/14/20	M. Betinsky	Continue "hard review" of draft Complaint.	1.60	\$848.00
09/15/20	R. Bennett	Telephone conference with Marc Betinsky re organization of complaint [.4]; telephone conference with client [.4]; telephone conference with client re meeting [.5]; telephone conference with Furst at Strib [.5]; telephone conference with RK receptionist re medical records [.4]; telephone conference with Marc Betinsky re same [.4].	2.60	\$2,223.00
09/15/20	M. Betinsky	T/C with RB re draft Complaint (.8); Revise, restructure, reorganize complaint and add additional details to same (4.2)	5.00	\$2,650.00
09/16/20	R. Bennett	Review medical imaging records [.5]; review revised complaint [1.0]; telephone conference with Marc Betinsky [.4]; prepare for interview [.4].	2.30	\$1,966.50
09/16/20	M. Betinsky	T/C with RB re new medical and adding medical information to Complaint (.4); Work with and review newly received documents from Soren with medical imaging and radiology reports, add new allegations regarding same, amendments to draft Complaint for meeting with media on 9/17 (3.1) T/C and emails to Soren re media meeting, emails RB (.3)	3.80	\$2,014.00
09/17/20	R. Bennett	Prepare for and client conference with R. Furst [2.3]; conference with client [.6].	2.90	\$2,479.50
09/17/20	A. Koob	Review emails regarding imaging from client, review same and respond to MEB question regarding imaging.	0.20	\$46.00

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09/18/20	R. Bennett	Conference with CR team [.4]; review text message and respond [.4]; review MPD IA request [.3]; review and revise complaint [1.2]; telephone conference with Marc Betinsky [.3]; telephone conference with client [.5]; review civil cover sheet [.3].	3.40	\$2,907.00
09/18/20	A. Noel	Telephone conference with team.	0.30	\$219.00
09/18/20	K. Bennett	Discuss strategy and status of complaint/filing.	0.30	\$205.50
09/18/20	M. Betinsky	Conference call CRG re status and strategy (.4); further edits to draft Complaint and civil cover sheet (1.7); T/C with RB re same (.3); review IA letter re meeting and T/C with RB re same (.3).	2.70	\$1,431.00
09/21/20	R. Bennett	Review final draft [.7]; telephone conference with client [.6]; telephone conference with Furst [.3].	1.60	\$1,368.00
09/21/20	M. Betinsky	Final review of Complaint for filing, T/Cs with RB re same, oversee filing same and civil cover sheet (1.5); emails with team re judicial assignment (.2); review Star Tribune article re Complaint (.8); T/C with RB and R. Furst re Star Tribune article errors (.3)	2.80	\$1,484.00
09/21/20	A. Koob	Receive and review billing and medical records from M Health, update index and compare to medical records and dates of service, begin review of medical records from M Health (557 pages) and begin to work on summary of records.	2.90	\$667.00
09/22/20	R. Bennett	Telephone conference with Griff Merry [.4]; telephone conference with Brian Cade [.3]; telephone conference with R. Kreps [.4]; conference with Randy Furst re new writers [.4]; telephone conference with Andy Canadeo IA/MPD [.2]; telephone conference with Nick Adler [.3]; telephone conference with MEB [.3]	2.30	\$1,966.50
09/22/20	A. Noel	Review correspondence re: judicial assignment and damages.	0.50	\$365.00
09/22/20	K. Bennett	Update re: witness to Stevenson's injury.	0.30	\$205.50
09/22/20	M. Betinsky	T/C with RB re Complaint, email same to Soren and Ronn Kreps (.3); email Jack Ryan re Complaint and retention, complete file opening form, emails and T/C with RB re same (.4).	0.70	\$371.00

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09/22/20	A. Koob	Continue to review medical records from M Health and draft summary of records, finalize summary of M Health records and email same to KHB and AJN.	5.40	\$1,242.00
09/22/20	N. Adler	Interview Griff Merry. Correspond with Bob Bennett.	1.00	\$220.00
09/23/20	R. Bennett	Conference with CR team re action plan [.4]; telephone conference with client [.3]; telephone conference with Jack Ryan [.6].	1.30	\$1,111.50
09/23/20	K. Bennett	Conf call with civil rights team re: strategy.	0.40	\$274.00
09/23/20	M. Betinsky	Conference ZOOM with CRG re status and strategy.	0.40	\$212.00
09/24/20	R. Bennett	Telephone conference with Sgt. Canadeo.	0.30	\$256.50
09/24/20	K. Bennett	Review Tirado Amended Complaint and Motion to Dismiss [1.5].	1.50	\$1,027.50
09/28/20	R. Bennett	Review Griffin Merry interview notes and Adler email/report.	0.50	\$427.50
09/29/20	A. Koob	Request billing records from U of M Physicians related to M Health billing and records previously received and update request index.	0.20	\$46.00
10/01/20	R. Bennett	Telephone conference with Ronn Kreps.	0.50	\$427.50
10/06/20	R. Bennett	Review medical note [.3]; telephone conference with K. Sarff [.2]	0.50	\$427.50
10/07/20	A. Noel	Telephone conference with team re City response and discovery.	0.30	\$219.00
10/07/20	K. Bennett	Discuss updates and plan re: disclosures of medical records to Saarf with team	0.30	\$205.50
10/07/20	A. Koob	Zoom meeting with team with updates, strategy moving forward, and medical records status.	0.30	\$69.00
10/12/20	R. Bennett	Telephone conference with Ronn Kreps re: Soren's surgery/COVID-19 status [.4]; telephone conference with client [.5].	0.90	\$769.50
10/13/20	R. Bennett	Follow-up re Soren's cheek graft surgery.	0.40	\$342.00
10/20/20	R. Bennett	Respond to Sarff re stip for protective order [.5]	0.40	\$342.00
10/22/20	K. Bennett	Prep and Zoom call with Minneapolis City Attorneys re: PO and case progression.	0.30	\$205.50

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10/26/20	A. Koob	Receive and review U of M Physicians billing records, update index, review of other M Health billing and records.	0.80	\$184.00
10/27/20	R. Bennett	Conference with CRT [.3]; review several issues [.5].	0.80	\$684.00
10/27/20	A. Noel	Telephone conference with team re file status and action items.	0.30	\$219.00
10/27/20	K. Bennett	Conf re: update and next steps with civil rights team [.3].	0.30	\$205.50
10/27/20	M. Betinsky	Conference call CRG re status and strategy (.3); check status of service and oversee accomplishing service on city and Arrandondo, filing of affidavits of service (.3).	0.60	\$318.00
10/27/20	A. Koob	Zoom call with Civil Rights Team to discuss strategy moving forward [.3]; review of U of M Physician records regarding Dr. Uppgaard appointments and billing [.3].	0.60	\$138.00
10/28/20	A. Noel	Review recent case law and complaints.	0.90	\$657.00
11/02/20	R. Bennett	Emails to/from A. Koob [.3]; telephone conference with Soren Stevenson [.5]; telephone conference with A. Koob [.3]; review FOIA response [1.0].	2.10	\$1,795.50
11/02/20	K. Bennett	Review data request response.	0.80	\$548.00
11/02/20	M. Betinsky	Review documents from city in response to open records request and email CRG re same (.4); emails re Soren's latest medical treatment (.1).	0.50	\$265.00
11/02/20	A. Koob	Review of requested records and email to client to confirm treaters prior to requesting updated records [.4]; review response from client and respond to same [.1]; submit requests for updated records and update request index [.3]; email RB and MEB regarding client's lack of follow-up with Chang referral [.1]; telephone call with RB regarding past medical history per client [.3]; review M Health records regarding ablation and eye vision and update medical summary regarding same, request operative/chart notes regarding ablation and email to RB and MEB with updated vision and ablation information [1.1].	2.30	\$529.00
11/10/20	R. Bennett	Telephone conference with Andy Noel re Rule 12b6 motion prospects and additional arguments.	0.70	\$598.50

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11/11/20	A. Noel	Telephone conference with RB re 12b6 motion [.7]; conduct fact based survey of other similar cases with memo to team re same [1.1]	1.80	\$1,314.00
11/17/20	R. Bennett	Telephone conference with K. Sarff [.5]; quick review of filings [.7].	1.20	\$1,026.00
11/17/20	M. Betinsky	Brief review of city defendants' motion to dismiss.	0.30	\$159.00
11/18/20	R. Bennett	Conference with Andy Noel re: MTD	0.40	\$342.00
11/18/20	A. Noel	telephone conference with RB re: MTD [.4]	0.40	\$292.00
11/19/20	R. Bennett	Review motions and filing [1.7]; conference with Andy Noel [.4].	2.10	\$1,795.50
11/19/20	K. Bennett	Review memo re: motion to dismiss.	2.00	\$1,370.00
11/20/20	R. Bennett	Conference with Andy Noel and Katie Bennett re Rule 12 motion response.	0.40	\$342.00
11/20/20	A. Noel	Telephone conference with Bob Bennett and Marc Betinsky re officer ID and Doe.	0.40	\$292.00
11/20/20	A. Noel	telephone conference with RB/KHB re MTD [.4]	0.40	\$292.00
11/20/20	K. Bennett	telephone conference with RB/AJN re MTD [.4]	0.40	\$274.00
11/20/20	M. Betinsky	Review motion to dismiss and begin work on response to same.	0.80	\$424.00
11/23/20	M. Betinsky	Work on opposition to motion to dismiss.	1.60	\$848.00
11/24/20	M. Betinsky	Continue work on opposition to motion to dismiss, T/C with RB re same, T/C with B. Resch re Samaha oral argument before Judge Nelson and arguments for same.	2.20	\$1,166.00
11/25/20	M. Betinsky	Continue work on opposition to motion to dismiss.	2.60	\$1,378.00
11/30/20	M. Betinsky	Continue work on opposition to motion to dismiss.	4.50	\$2,385.00
11/30/20	A. Koob	Review email from D. Roisum regarding Fairview records requests, email AJN regarding cost of same, review response and email to D. Roisum approving costs.	0.20	\$46.00
12/01/20	M. Betinsky	Continue work on opposition to motion to dismiss.	6.50	\$3,445.00

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12/02/20	R. Bennett	Review response to Rule 12 motion in detail [2.2]; telephone conference with Marc Betinsky re filing [.3].	2.50	\$2,137.50
12/02/20	A. Noel	Review response to MTD and offer revisions.	2.00	\$1,460.00
12/02/20	M. Betinsky	Complete and edit draft of opposition to motion to dismiss, emails CRG re same (5.5); T/C RB with edits to same (.3)	5.80	\$3,074.00
12/03/20	R. Bennett	Telephone conference with client [1.0]; review Judge Tunheim's order in Sagehorn [.6].	1.60	\$1,368.00
12/03/20	M. Betinsky	Final review and edits to opposition to motion to dismiss, emails AJN with additional edits, prepare RB Declaration with opposition, oversee filing same, email client with opposition.	4.00	\$2,120.00
12/04/20	M. Betinsky	Revise stipulation for John Doe Defendants from Marks for use in Soren's case and email RB re same.	0.40	\$212.00
12/07/20	M. Betinsky	Email and T/C with K. Sarff re John Doe extension, email CRG re same, review draft protective order regarding same.	0.70	\$371.00
12/08/20	M. Betinsky	Draft and send email to K. Sarff re John Doe extension and early discovery	0.50	\$265.00
12/09/20	A. Noel	Telephone conference with team re status and action items.	0.50	\$365.00
12/09/20	M. Betinsky	Observe argument of Armstrong MTD before Judge Nelson (1.9); conference call with CRG following same re arguments raised at hearing and questions from the bench for consideration in connection with MTD Soren's Complaint (.5)	2.40	\$1,272.00
12/10/20	M. Betinsky	Emails K. Sarff re John Doe stipulation and revisions to same.	0.70	\$371.00
12/11/20	M. Betinsky	Emails with K. Sarff re John Doe extension and protective order.	0.70	\$371.00
12/14/20	M. Betinsky	Emails K. Sarff re protective order and extension for John Does.	0.20	\$106.00
12/15/20	R. Bennett	Telephone conference with Marc Betinsky and Katie Bennett re protective order and Doe issue [1.0]; conference with Marc Betinsky re: Samaha [.4]; telephone conference with Sieff re mediation and stip [.4].	1.80	\$1,539.00

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12/15/20	K. Bennett	Review MEB email and Sarff's PO [.4] conf call with MEB and RB re: next steps/mediation [.4].	0.80	\$548.00
12/15/20	M. Betinsky	Conference with CRG re protective order issue and John Doe extension and strategy for case and early resolution, review draft protective order (1.0), additional emails re same, T/C with K. Sarff re same, revise and email John Doe stipulation (1.2); listen to oral argument in Samaha case re pending motion to dismiss and arguments for same (1.2); conference with RB re: same (.4)	3.80	\$2,014.00
12/16/20	R. Bennett	Telephone conference with Marc Betinsky x3 re stipulation and protective order.	0.80	\$684.00
12/16/20	M. Betinsky	Emails with court re rescheduled hearing and NEF re same (.1); emails K. Sarff re John Doe stip, amendments to same, draft proposed order, and oversee filing of same (.4); brief research re alleged service issue & emails RB re same (.3); telephone conferences with RB re stip and PO (.8)	1.60	\$848.00
12/18/20	K. Bennett	Review reply memo in support of defendants' motion to dismiss [1.5].	1.50	\$1,027.50
12/18/20	M. Betinsky	Review reply brief in support of city's motion to dismiss and emails CRG re same (.7).	0.70	\$371.00
12/21/20	A. Koob	Review certificate of no records from Fairview (M Health) regarding photos and update index regarding same.	0.10	\$23.00
12/22/20	R. Bennett	Telephone conference with A. Koob re medical records [.4]; review TNL Order [.2]; telephone conference with Marc Betinsky [.2]; review and respond to Sarff request for mediation [.8]; telephone conference with Marc Betinsky [.9].	2.50	\$2,137.50
12/22/20	M. Betinsky	Emails re mediation, T/C with RB re conversations with Sarff and John Doe extension and review order re same.	0.30	\$159.00
12/22/20	A. Koob	Telephone call with RB regarding medical records update/status moving forward [.4]; download/save M Health imaging CD and begin to review/organize voluminous M Health updated records [.7].	1.10	\$253.00
12/23/20	R. Bennett	Email and telephone conference with K. Sarff [.5]; conference with MEB re mediation [.3].	0.80	\$684.00
12/23/20	M. Betinsky	Emails re potential mediation and T/C with RB re same.	0.30	\$159.00

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12/24/20	R. Bennett	Conference with client re mediation/issues - mediator [1.0]; memo to CRT [.3]; review medical [.8].	2.10	\$1,795.50
12/28/20	R. Bennett	Telephone conference with R. Krepps [.5]; telephone conference with client [.5].	1.00	\$855.00
12/28/20	A. Koob	Emails to/from D. Roisum regarding records [.2]; continue review of updated M Health records and requested ablation records and update summary of M Health records memo regarding same [5.6]; email to from client regarding ocularist, request records from Midwest Eye Laboratories Woodbury LLC and update index [.3]; submit request for Dr. Uppgaard records and update index [.2]; review M Health billing (updated records) and update billing index regarding same [.6]; review and update billing from Brave Choices [.3]; review of updated records from Brave Choices and update summary memo regarding same [1.5].	8.70	\$2,001.00
12/29/20	A. Koob	Finalize summaries of updated Brave Choices and M Health records and email updates to RB, KHB and AJN.	2.10	\$483.00
12/31/20	R. Bennett	Review Sarff email and conference with CRT.	0.30	\$256.50
12/31/20	A. Noel	Review medical summary [.9] and telephone conference with Bob Bennett re mediators and settlement concepts [.3]	1.20	\$876.00
01/03/21	R. Bennett	Memo to RK re expert in monocular vision [.3]; text mediator Weyandt x2 [.2] [.2]; review file [1.2]; review Dr. Sher CV in detail [.8]; conference with client [.4].	3.10	\$2,650.50
01/04/21	R. Bennett	Conference with CRT [.4]; email Sieff [.5]; telephone conference with Dr. Sher [.5].	1.40	\$1,197.00
01/04/21	A. Noel	Telephone conference with team re status and action items.	0.40	\$292.00
01/04/21	K. Bennett	Civil rights dept call re: status/plan/next steps/assignments.	0.20	\$137.00
01/04/21	M. Betinsky	Emails K. Sarff re mediation, CRG Zoom strategy session re mediation and next steps.	0.30	\$159.00

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01/04/21	A. Koob	Review of U of M School of Dentistry records and prepare summary of same [.9]; update/review index of requests [.1]; ZOOM meeting with Civil Rights Group regarding status of case/mediation/records to date [.3].	1.30	\$299.00
01/05/21	R. Bennett	Review dental records - U of M dentistry [.5]; telephone conference with Angela Koob [.5]; conference with AJN re medical [.2]	1.20	\$1,026.00
01/05/21	A. Noel	Review updated medical memos [1.0] and telephone conference with Bob Bennett [.2]	1.20	\$876.00
01/05/21	K. Bennett	Review medical review summary - MTF UofM School of Dentistry [.7]Review email update on records and billing from ATK [.4].	1.10	\$753.50
01/05/21	A. Koob	Finalize summary of U of M School of Dentistry records and prepare medical summary with all records to date in chronological order, email to KHB, RB, AJN with update of records to date and missing records [2.5]; emails to/from K. Lyons at CAG regarding records and emails to/from D. Roisum regarding CNR and checking specific dates of appointments [.3]; telephone call with RB regarding status of records [.5]; review email from KHB regarding summary, receive and review Midwest Eye records and email to KHB, RB and AJN regarding same [.2]; review Midwest Eye Laboratories medical records, brief summary of same, review of billing records from Midwest Eye and update request and billing indexes [.5]; email to D. Roisum regarding requesting referenced photos from Midwest Eye [.1]; add Midwest eye records to medical summary and review of updated summary [.5]; summary/update email to KHB, AJN, RB with updated Midwest Eye information and medical summary [.3].	4.90	\$1,127.00
01/06/21	R. Bennett	Review A. Koob memo re prosthesis issues and respond [.6]; review medical records summary [1.0]; conference with Katie Bennett and Marc Betinsky re medical and Weyandt submission [.6].	2.20	\$1,881.00
01/06/21	K. Bennett	Conf call with MEB/RB re: strategy/mediation submission.	0.60	\$411.00
01/06/21	M. Betinsky	T/C w/ RB re MTD hearing and strategy and conf w/RB/KHB re strategy (.6); emails AV team re pictures for use in litigation (.2).	0.80	\$424.00

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01/06/21	A. Koob	Prepare letter to MN DHS requesting interest information and prepare authorization to send with letter, fax same.	0.50	\$115.00
01/07/21	R. Bennett	Conference with Katie Bennett re photography session [.4]; review Sarff email to Weyandt [.3]; review images and telephone conference with BITS for help [1.0]; review Marc Betinsky email report [.3].	2.00	\$1,710.00
01/07/21	A. Noel	Review jury verdict/settlement research and email to Katie Nadem.	1.10	\$803.00
01/07/21	K. Bennett	Meeting with client and take photos/videos for mediation submission [.6] Review information re: pricing and next steps from ATK; strategize re: mediation submission [1.6]; conference with RB re: photography session [.4]	2.60	\$1,781.00
01/07/21	M. Betinsky	Emails with Soren re photographs for use in the mediation/litigation, coordinate photographing, meet with Soren and KHB for photographs, emails RB re same (1.0); emails with Court re technology test for 1/15 hearing and coordinate same (.2).	1.20	\$636.00
01/07/21	A. Koob	Telephone call to Midwest Eye Laboratories regarding cost/replacement of prosthesis and email information/update to RB, KHB, AJN regarding same.	0.50	\$115.00
01/07/21	P. McCaffrey	Prep for, and actual photo/video shoot for client. Including processing and uploading photos to network drive.	2.50	\$737.50
01/08/21	R. Bennett	Telephone conference with Katie Bennett re mediation brochure [.4]; review Greg Weyandt email and respond [.3]; telephone conference with client [.6].	1.40	\$1,197.00
01/08/21	K. Bennett	telephone conference with RB re mediation brochure [.4]	0.40	\$274.00
01/10/21	M. Betinsky	Review complaint and identify key case law to prep for motion to dismiss hearing on 1/15.	1.50	\$795.00
01/11/21	R. Bennett	Conference with MEB re action plan [1.0]; review photos and video [1.0].	2.00	\$1,710.00

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01/11/21	K. Bennett	Review medical imaging [.8]Review photographs/video of injuries and other evidence/plan for mediation submission [.5]Review medical summary/strategize for mediation submission [2.5]Begin drafting mediation submission [4.0].	7.80	\$5,343.00
01/11/21	M. Betinsky	Review pleadings and cases, prep for oral argument on motion to dismiss (2.9), multiple T/Cs with RB re same (1.0)	3.90	\$2,067.00
01/11/21	A. Koob	Pull and save cases cited in Defendants' Motion to Dismiss Brief, Plaintiff's Brief in Opposition and Defendants' Reply Brief per MEB request, email MEB regarding same and email to Offices Services regarding printing cases [3.3]; begin to put together medical and billing records in advance of production, including redaction of billing records [1.8].	5.10	\$1,173.00
01/12/21	R. Bennett	Telephone conference with K. Sarff [.5]; telephone conference with Dr. Sher [.4]; email CRT [.4]; review Koob email re medical/dental records and new photos [.5]; review further Koob emails and Katie Bennett email to client [.4]; telephone conference with MEB re: arguments/MTD hearing [.3]	2.50	\$2,137.50
01/12/21	K. Bennett	Continue drafting mediation submission and reviewing file [7.2] Email client with list of items and questions needed for submission [.5].	7.70	\$5,274.50
01/12/21	M. Betinsky	T/C with B. Resch re status of Samaha MTD and information re related pending protest cases (.5); T/Cs with RB re same and arguments for MTD hearing (.3); continue review of motion papers, complaint, and caselaw to prep for argument on MTD (5.0); emails re expert review (.2).	6.00	\$3,180.00
01/12/21	A. Koob	Finalize case cite notebooks for MEB [.3]; organize, prepare and review medical records received to date to send to Dr. Sher, review of U of M School of Dentistry bills and update billing index, review/save photos from Midwest Eye Laboratories, email to CRG with updated information and records inquiry [2.5].	2.80	\$644.00
01/13/21	R. Bennett	Correspondence to Dr. Sher re materials and file.	0.50	\$427.50

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01/13/21	K. Bennett	Review MPR article re: non lethal weapons used by MPD.	0.20	\$137.00
01/13/21	M. Betinsky	Continue prep for oral argument on motion to dismiss and work on outline of argument.	4.50	\$2,385.00
01/13/21	A. Koob	Continue to prepare records and bills for Sarff, including finalizing redaction of bills [.5]; receive and brief review of itemization and interest from MN DHS [.2]	0.70	\$161.00
01/14/21	R. Bennett	Review Strib article on less lethal usage [.5]; email client [.3]; telephone conference with A. Koob re discovery to City of Mpls. [.5]; review NE Journal of Medicine letter and supplementary appendix in detail [.8]; correspondence to Dr.Sher [.3]; telephone conference with Adam Hansen [.5]; conference with Marc Betinsky re use of NE Journal study [.5]	3.40	\$2,907.00
01/14/21	M. Betinsky	Review records and email to Sarff re Soren's injuries.	0.40	\$212.00
01/14/21	M. Betinsky	Continue work on outline and prep for motion to dismiss hearing.	5.00	\$2,650.00
01/14/21	A. Koob	Email to Civil Rights Group regarding records to Sarff and MN DHS lien information - updates [.3]; internet search for NEJM letter regarding use of non-lethal projectiles and email same to RB [.2]; telephone call with RB regarding documents for Sarff [.5]; emails to/from RB regarding NEJM Letter and Supplementary Appendix [.2]; prepare letter to Sarff and email same to RB for review [.4]; contact Hennepin Health regarding subrogation/lien information [.2]; prepare letter to Hennepin Health requesting subro information and prepare authorization regarding same, email letter and authorization to Hennepin Health [.6]; finalize letter to Sarff, finalize materials to send to Sarff, telephone call with BITS regarding attaching imaging and email materials to Sarff via Accellion [.6]; emails to/from K. Lyons regarding additional records [.2]; email from J. Hanslich at Sarff's office requesting materials and forward same [.1].	3.30	\$759.00

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01/15/21	R. Bennett	Telephone conference with Sieff re: Dr. Sher witness experience[.3]; email to Dr. Sher [.2]; attend motion hearing [.9]; telephone conference with Katie Bennett re conference with Stevenson - Holt QMHP and report [.4].	1.80	\$1,539.00
01/15/21	K. Bennett	Attend hearing on Motion to Dismiss [1.0] Continue drafting mediation submission [1.0]; conference with RB re: Holt and report [.4]	2.40	\$1,644.00
01/15/21	M. Betinsky	Final prep for motion to dismiss hearing, argue motion to dismiss before Judge Nelson.	5.40	\$2,862.00
01/15/21	P. McCaffrey	Setup of all tech needs for courtroom. testing with attorneys and monitoring of actual event for the time of hearing.	1.50	\$442.50
01/15/21	R. Ehamjian	-Tech setup and test call for oral argument day prior -Day of tech setup and test -Running tech during oral argument.	1.00	\$280.00
01/16/21	R. Bennett	Review Brave Choices medical records [.6]; conference with Katie Bennett before telephone conference with Heather Holt [.5]; telephone conference with Katie Bennett and Heather HOlt [.4]; telephone conference with Soren [.5]; email new demand to Kristin Sarff [.4].	2.40	\$2,052.00
01/16/21	K. Bennett	Prep for call with Heather Holt [2.1] discuss same with RB [.5] and call with Holt and RB re: Soren's treatment and prognosis [.4]	3.00	\$2,055.00
01/17/21	R. Bennett	Review Soren's letter re personal damages.	0.50	\$427.50
01/19/21	M. Betinsky	Emails re current subro amounts and review same.	0.20	\$106.00
01/19/21	A. Koob	Review subro information received to date and email update to RB, KHB, MEB and AJN with update regarding same.	0.30	\$69.00
01/25/21	R. Bennett	Telephone conference with Weyandt [.5]; email Sieff re evaluation [.3]; telephone conference with ATK re: prosthesis cost/Dr. Sher [.4]	1.20	\$1,026.00
01/25/21	A. Koob	Telephone conference with RB regarding prosthesis costs for Dr. Sher, email to Dr. Sher with prosthesis costs information from Midwest Eye Laboratories.	0.40	\$92.00
01/26/21	R. Bennett	Review and consider Dr. Sher's draft report.	0.80	\$684.00

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01/27/21	R. Bennett	Review and discuss Sher report with Andy Noel and Katie Bennett [.8]; review Holt case [.7].	1.50	\$1,282.50
01/27/21	A. Noel	Review expert report and telephone conference with Bob Bennett re same.	1.30	\$949.00
01/27/21	K. Bennett	Review Sher report [.4], discuss same with RB [.8]; email Heather Holt and review Case Summary/send to group [.8].	2.00	\$1,370.00
01/29/21	R. Bennett	Review and approve expert's reports/summaries of Dr. Sher and Ms. Holt [1.4]; details re scheduling of mediation [.3]; telephone conference with client [.3].	2.00	\$1,710.00
01/29/21	M. Betinsky	Legal research on less-lethal munitions and clearly-established law.	0.70	\$371.00
02/01/21	R. Bennett	Telephone conference with client.	0.60	\$513.00
02/01/21	A. Koob	Review expert report, CV and additional materials from RB and organize, save same to electronic file and email RB and KHB regarding same.	0.30	\$69.00
02/02/21	R. Bennett	Call A. Koob re Sher/Holt/James Snyder, Elizabeth Hector status [.8]; deal with experts [.7].	1.50	\$1,282.50
02/02/21	A. Koob	Begin review/comparison of itemization from HennepinHealth to bills we have to date [.5]; telephone call with RB regarding witness interviews [.8]; review Dr. Sher report and Dr. Hunt report in advance of interviews with Soren's roommate and girlfriend [.8]; prepare witness questions for Elizabeth [.6]; prepare witness questions for Jamee (room mate) [.6].	3.30	\$759.00
02/03/21	R. Bennett	Review Weyandt email, mediation agreement, draft settlement agreement [.8]; telephone conference with client [.3]; email to Katie Bennett re submission [.3]; review and assemble list of things needed for submission and telephone conference with K. Sarff and voice mail [.5].	1.90	\$1,624.50
02/03/21	A. Koob	Compare DHS itemization to bills received to date and submit request for anesthesia bills.	1.50	\$345.00
02/04/21	R. Bennett	Telephone conference with A. Koob re emails [.6]; telephone conference with K. Sarff [.4]; email Sarff Sher and Holt reports [.5].	1.50	\$1,282.50

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02/04/21	K. Bennett	Review update from Soren and reply with status update [.5]Pull updated medical to review for continuing to draft mediation submission [.3]Review mediation instructions from Weyandt [.3]Review bill status update from ATK [.3].	1.40	\$959.00
02/04/21	A. Koob	Telephone call to Jamee Heehn, telephone call to Elizabeth Snyder, email update to RB and KHB [.2]; continue to work on subro and prepare update email to RB and KHB [1.3]; telephone call with RB regarding lien amounts and strategize regarding same [.6]; review of COVID hospital records and pull specific HOT DOCS for RB and email same to RB [.6]; telephone call to Fairview billing to check status of bills not showing paid on our received statements [.2]; telephone call to HennepinHealth (left voice mail) and telephone call to MN DHS (left voice mail) [.1]; email update to RB [.1]; email Jamee regarding setting up a time to interview regarding Soren [.1]; email to RB with Midwest Eye Lab prosthesis information for Sarff [.1].	3.30	\$759.00
02/05/21	R. Bennett	Correspondence to client [.3]; correspondence to Sarff [.3]; zoom conference with CRT [.4].	1.00	\$855.00
02/05/21	K. Bennett	Continue drafting mediation submission [3.0]; conference re: mediation attendees and strategy [.4].	3.40	\$2,329.00
02/05/21	M. Betinsky	ZOOM with CRG re strategy for mediation and case moving forward.	0.40	\$212.00
02/08/21	R. Bennett	Telephone conference with A. Koob re interview with Elizabeth Heehn [.6]; telephone conference with Marc Betinsky [.3]; telephone conference with Marc Betinsky and Katie Bennett re submission [.5].	1.40	\$1,197.00
02/08/21	K. Bennett	Continue drafting mediation submission [4.0]; get update from RB/MEB re: ATK call with girlfriend [.5].	4.50	\$3,082.50
02/08/21	M. Betinsky	Conference call with RB/KHB re mediation submission and assertions/strategy/attachments for same (.5), review Strib article re Rowader for use at mediation and emails re same (.3)	0.80	\$424.00

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02/08/21	A. Koob	Telephone call with Soren's girlfriend, Elizabeth Heehn - interview [2.2]; work on memo to file regarding summary of interview of Elizabeth Snyder [2.8]; telephone call with RB regarding phone call with Elizabeth [.4]; telephone call with RB [.2]; telephone call with Jamee to set up time to interview [.1].	5.70	\$1,311.00
02/09/21	R. Bennett	Telephone conference with Katie Bennett [.5] re mediation submission and Rowader Counterpoint [2.3]; telephone conference with A. Koob re Jayme Snyder[.5]; review A. Koob interview note with Elizabeth Heehn [.5].	3.80	\$3,249.00
02/09/21	K. Bennett	Review articles, Sauro manifesto to strategize for mediation [1.5]; discuss same with RB [.5].	2.00	\$1,370.00
02/09/21	A. Koob	Continue to organize memo to file regarding call with Elizabeth [4.1]; telephone interview/call with Jamee [1.1]; finalize memo to file regarding call with Elizabeth and forward same to RB and KHB [.6]; telephone call with RB regarding Jamee interview [.5]; work on memo to file regarding interview with Jamee [2.7].	9.00	\$2,070.00
02/10/21	R. Bennett	Continuing revision of mediation submission [2.2]; conference with Katie Bennett re new edits [.5].	2.70	\$2,308.50
02/10/21	K. Bennett	Review ATK memo re: interview with Elizabeth Heehn [.9]Edit mediation submission [2.2]Review Spec Sheet for BIP; review BIP photos from scene [.3]Second round of edits with RB [.5].	3.90	\$2,671.50
02/11/21	R. Bennett	Review A. Koob reports on James Snyder.	1.00	\$855.00
02/11/21	A. Noel	Assemble materials to supplement mediation package a	1.00	\$730.00
02/11/21	K. Bennett	Review memo re: Jamee Synder interview [.9]Strategize with re: to interview and mediation submission [.5].	1.40	\$959.00
02/11/21	A. Koob	Review and finalize memo to file regarding interview with Jamee Snyder and forward same to RB and KHB [2.6]; submit request for updated Fairview, physician billing and update index regarding same [.2]; telephone call with Kim at MN DHS regarding itemization [.1]; email update on itemization/MN DHS to RB [.1].	3.00	\$690.00

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02/12/21	R. Bennett	Review and respond to client [.5]; conference with Katie Bennett re submission [.4]; telephone conference with client [.6].	1.50	\$1,282.50
02/12/21	K. Bennett	Look for instagram video of shooting [.8] Review interview and edit mediation submission [1.0]; conference with RB re: submission [.4]	2.20	\$1,507.00
02/14/21	R. Bennett	Review medical records, billing and review and revise mediation submission.	2.40	\$2,052.00
02/15/21	R. Bennett	Conference with Katie Bennett re mediation submission [1.0]; telephone conference with Weyandt [.5]; voice mail to Sarff [.2]; telephone conference with client [.4]; email to CRT [.4]; telephone conference client re upcoming surgery and MD appointments [.3]; email to file [.3]; telephone conference with Katie Bennett re revisions to submission [.6].	3.70	\$3,163.50
02/15/21	K. Bennett	Emails to Adler/Cade re: instagram video [.3] Strategize with RB re: mediation [1.0] Review email re: additional surgery [.2] Review emails re: appointments and additional, upcoming surgeries [.4]; discuss plan with RB re: mediation submission [1.0]; conference with RB re: revisions to submission [.6]	3.50	\$2,397.50
02/15/21	M. Betinsky	Emails re latest medicals for Soren and need for further surgery.	0.20	\$106.00
02/15/21	A. Koob	Review email from RB regarding additional surgery and previous costs of similar surgeries, review records relating to previous surgeries and respond to same [.3]; review email response from RB regarding records requests and telephone call to HennepinHealth to follow up on itemization questions (left voice mail) [.1].	0.40	\$92.00
02/16/21	R. Bennett	Telephone conference with client [.5]; conference with Katie Bennett and Andy Noel (phone and text) [.5]; telephone conference with Katie Bennett re additional revisions [.5]; telephone conference with Teresa McClain re evaluations and new medical issues, her recent jury verdict in an eye out case [.6]; review and revise latest draft [1.0].	3.10	\$2,650.50
02/16/21	K. Bennett	Review mediation submission and continue editing [4.8]; calls and texts conference with team re: submission [1.0]	5.80	\$3,973.00

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02/16/21	A. Koob	Email to Jamee following up on video of incident in her possession [.1]; email to RB regarding updated records requests and review response regarding same [.1]; review email from KHB regarding prosthesis email and forward same to KHB [.1]; review email from Jamee regarding video of incident and respond to same [.1].	0.40	\$92.00
02/17/21	R. Bennett	Telephone conference with team MPD less-lethal policies old (pre 12/22/20) and now [1.0]; review 2/17/21 draft [.7]; telephone conference with K. Sarff and memo to file [1.0]; telephone conference with Marc Betinsky re Sarff request for protective order covering mediation [.5].	3.20	\$2,736.00
02/17/21	K. Bennett	Continue to pull mediation exhibits/save to T drive.	0.40	\$274.00
02/17/21	K. Bennett	Organize mediation submission exhibits [1.2] Discuss plan with MEB/RB [1.0].	2.20	\$1,507.00
02/17/21	M. Betinsky	Conference call with RB/KHB re mediation submission and strategy (1.0), follow-up with RB re call with Sarff and protective order issue (.5), begin review of mediation submission (1.0)	2.50	\$1,325.00
02/18/21	R. Bennett	Review last draft [.6]; zoom with Katie Bennett, Marc Betinsky and Andy Noel re zoom edits and strategy [1.0]; telephone conference with Soren re MD appointments and results and memo to Sarff [1.6]; review revised draft and Sarff draft [1.6]; review and approved limited protective order and telephone conference with Marc Betinsky re same [.5]; telephone conference with client [.3].	5.60	\$4,788.00
02/18/21	A. Noel	Review/revise mediation submission [1.3] and OCW team re: submission contents and mediation strategy [1.0]	2.30	\$1,679.00
02/18/21	K. Bennett	Review/finalize exhibits for mediation submission [1.0] Conf with AJN/RB/MEB re: mediation submission edits/plan [1.0] Call with MEB re: additional edits [.5] Continue editing mediation submission [1.0]; edit letter to go to Sarff and email to RB [.8] Review medical update [.6] Review Stip for PO [.4]; call with ATK re: case status [.1]	5.40	\$3,699.00

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02/18/21	M. Betinsky	Complete review and revisions to mediation submission (2.0), Zoom with CRG re same (1.0), follow-up T/C with KHB re additional edits (.5), attention to exhibits to be submitted with mediation letter (.5); draft stipulation for limited protective order re early exchange of information, revisions re comparison to prior drafts and email RB re same (1.2).	5.20	\$2,756.00
02/18/21	A. Koob	Review email update from RB to Sarff regarding Soren's recent appointments, review mediation submission [.2], telephone call with KHB regarding status of case [.1]	0.30	\$69.00
02/19/21	R. Bennett	Telephone conference with Katie Bennett and Andy Noel re edits and medical records [.5]; review methods for getting records with Katie Bennett [.4]; conference with Katie Bennett [.3] and review urology notes [.4]; email Sarff re meeting [.4]; analyze urology notes [.6]; telephone conference with Soren [.6].	3.20	\$2,736.00
02/19/21	A. Noel	telephone conference with KHB/RB re edits to mediation info and medical records [.5]	0.50	\$365.00
02/19/21	K. Bennett	Review new medical info, research re: same; calls to new providers re: rush records, emails/calls with ATK, contact client re: rush records request and instructions [2.5] Calls with RB and AJN re: plan [.5] and urology [.3]	3.30	\$2,260.50
02/19/21	M. Betinsky	T/Cs with RB re impending mediation, review latest medicals for Soren in advance of same (.3), emails Sarff re mediation (.2).	0.50	\$265.00
02/19/21	A. Koob	Review email from KHB regarding RUSH request for medical records and respond to same, telephone call with KHB regarding records request and confirmation of clinic, prepare request letter and authorization and fax same, email to KHB and RB regarding RUSH request.	0.60	\$138.00
02/22/21	R. Bennett	Review proposed revisions and telephone conference with Katie Bennett re same [.6]; review and revise near final submission [1.0]; approve final [.5]; conference with Andy Noel re actions pre-mediation [.4]; review and call Marc Betinsky re protective order draft [.3].	2.80	\$2,394.00
02/22/21	A. Noel	TCW RB re demand and negotiation strategy.	0.40	\$292.00

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02/22/21	K. Bennett	Discuss mediation submission with RB [.6]; continue drafting same and finalize [3.6] Coordinate exhibits to get to Weyandt; email Molly re: submission packet for RB and I [1.4] Send Zoom link info to all [.2].	5.80	\$3,973.00
02/22/21	M. Betinsky	Review final mediation submission (.2); review changes to draft protective order and T/C with RB re same (.6).	0.80	\$424.00
02/22/21	A. Koob	Review email from RB regarding Stevenson Urology visit, review Dr. note and forward same to D. Roisum to add to file [.1]; review email from KHB regarding mediation submission and prepare email with additional exhibits to send to mediator, send same [.3].	0.40	\$92.00
02/23/21	R. Bennett	Review email from Katie Bennett re Wattercott [.5]; review Judge Tunheim's Tirado opinion [.5]; telephone conference with Marc Betinsky re protective order [.3].	1.30	\$1,111.50
02/23/21	K. Bennett	Review information re: instagram video; emails/calls re: viewing video; video analysis [4.0] Review Shellum (eye out) verdict form and other damages information to prep for mediation [1.0]; Draft email to Sarff re: damages and video [.5]; edit with RB [.4] Review additional instagram videos, obtain stills, discuss with team [2.0].	7.90	\$5,411.50
02/23/21	M. Betinsky	Emails with K. Sarff re limited protective order, revise and finalize same, draft proposed order granting same (.5); contact chambers re submission of Judge Tunheim's Tirado MTD decision, draft letter to Judge Nelson and oversee filing same (.3).	0.80	\$424.00
02/23/21	A. Koob	Telephone call to Northpoint to confirm receipt of RUSH request and email KHB regarding same [.2]; emails with KHB regarding RUSH request and status of Soren's insurance on DOI [.2]; telephone call to Fairview billing to check status of 5.31.20 and 10.07.20 hospital bills [.2]; review CNR from U of M Physicians and update index regarding same [.1].	0.70	\$161.00

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02/24/21	R. Bennett	Review and analyze Shellum verdict and conference with Andy Noel and Katie Bennett [1.0]; review and analyze video of Soren's immediate injury and conference with Marc Betinsky, Andy Noel and Katie Bennett re effect on valuation and action plan [1.2]; review and revise email to Weyandt and K. Sarff [.8]; review and analyze Judge Wright's Order [.6]; work on damages analysis - email to Sarff and telephone conference with Katie Bennett [.9]; review video with Phil Sieff [.3]; review video with P. Schmit [.2].	5.00	\$4,275.00
02/24/21	A. Noel	TCW RB/KHB re damage supplement and other supplements to mediation submission and valuation [1.0]; review new orders on similar issues [1.1].	2.10	\$1,533.00
02/24/21	K. Bennett	Strategize re: mediation [2.0] Draft supplemental confidential submission to Weyandt [1.5]; edit with RB [.9] Email ATK with instructions and attachments for supplemental submission [.4]; call with AJN/RB re: supplement/video [1.0]; follow up mtg re: strategy on video and next steps [1.2]	7.00	\$4,795.00
02/24/21	M. Betinsky	Oversee filing stip for limited protective order and proposed order (.2); review newly received Instagram video re shooting and Soren's injuries and emails re same (.3); prepare and send letter to Judge Nelson with new Hennepin County decision in Wright v. City of Minneapolis (.2); follow-up conference re: same with team (1.2).	1.90	\$1,007.00
02/24/21	A. Koob	Receive and review email from Jamee (Soren's roommate) with information regarding Instagram video of DOI - Soren's injuries, find and view same, forward link/information to KHB and RB, various emails regarding viewing of video link [.5]; emails to Billing Dept. regarding request for life of file costs and fees on Friday per RB request [.1].	0.60	\$138.00
02/24/21	N. Adler	Cut and distribute Instagram video for Katie Bennett.	1.50	\$330.00
02/25/21	R. Bennett	Telephone conference with client [.5]; email Teresa McClain [.5]; review all video [1.2]; site visit [1.7]; review photos and compare to video [.6]; email A. Koob re photos [.3]; telephone conference with Nick Adler [.4]; review supplemental letter to Weyandt [.4].	5.60	\$4,788.00

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02/25/21	K. Bennett	Draft updated mediation submission letter to Weyandt [2.0].	2.00	\$1,370.00
02/25/21	A. Koob	Review and respond to email from KHB regarding supplemental materials to mediator [.1]; email to RB regarding costs and fees request and email to group regarding same [.1]; finalize supplemental letter to mediator, prepare supplemental attachments, upload and email same to mediator [.6].	0.80	\$184.00
02/26/21	R. Bennett	Telephone conference with Ronn Kreps [.5]; review fees and costs detail [.5]; review entire file in preparation for mediation [4.].	5.00	\$4,275.00
02/26/21	K. Bennett	Prep for mediation [4.0]Review fees and costs [.5].	4.50	\$3,082.50
02/26/21	M. Betinsky	Review fee information for mediation.	0.20	\$106.00
02/27/21	R. Bennett	Review Dr. Wattercott lengthy chart note in detail [1.0]; telephone conference with client re same and effects on him [.5].	1.50	\$1,282.50
02/28/21	R. Bennett	Research medical terminology and compare email to Weyandt and Sarff [1.0]; telephone conference with client [.5].	1.50	\$1,282.50
03/01/21	R. Bennett	Prepare for and attend mediation with client, Katie Bennett and Greg Weyandt [8.0]; telephone conference with client [.3]; telephone conference with Andy Noel [.3].	8.60	\$7,353.00
03/01/21	A. Noel	Telephone conference with RB [.3] and MEB [.3] both re mediation.	0.60	\$438.00
03/01/21	K. Bennett	Prep for mediation [1.5]Attend mediation [7.0].	8.50	\$5,822.50
03/01/21	M. Betinsky	T/Cs with RB [.2], AJN [.3] both re settlement discussions and mediation, next steps.	0.50	\$265.00
03/02/21	R. Bennett	Conference with Marc Betinsky re action plan [.5]; review Marc Betinsky email re discovery and discovery plan and agree on plan [.6].	1.10	\$940.50
03/02/21	A. Noel	Conference with Marc Betinsky re: discovery [.5] and review rules re timing of discovery [.5]	1.00	\$730.00

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03/02/21	M. Betinsky	T/C with RB re next steps, review rules on commencing discovery before initial PTC, email CRG re same, and T/C Sarff re scheduling Rule 26 meeting (1.0); work with screen grabs to highlight officers present at shooting scene for discovery and identification and numerous emails/calls re same (1.0); ZOOM with CRG re strategy and next steps (.5).	2.50	\$1,325.00
03/02/21	C. Sullivan	Preparation of graphics per M. Betinsky.	2.00	\$560.00
03/03/21	R. Bennett	Conference with CRT re action plan [.4]; review Marc Betinsky discovery plan [.4].	0.80	\$684.00
03/03/21	A. Noel	Conference with team re: action plan/next steps [.4]	0.40	\$292.00
03/03/21	K. Bennett	Conference with team re: action plan/next steps [.4]	0.40	\$274.00
03/03/21	K. Bennett	Review photographs for discovery/strategize re: same [1.0]; conference with team re: action plan and next steps [.4]	1.40	\$959.00
03/03/21	M. Betinsky	Conference with team re: action plan/next steps [.4]	0.40	\$212.00
03/04/21	R. Bennett	Telephone conference with Marc Betinsky re Sarff and Rule 26f meeting [.4]; telephone conference with client [.4].	0.80	\$684.00
03/04/21	M. Betinsky	Voicemails and T/C with Sarff re 26(f) meeting and commencing discovery (.4), follow-up T/C with RB re same and next steps (.4)	0.80	\$424.00
03/05/21	R. Bennett	Telephone conference with client.	0.80	\$684.00
03/08/21	R. Bennett	Review and approve G. Weyandt mediation invoice [.3]; telephone conference with Greg Weyandt re: any post-mediation follow-up [.5].	0.80	\$684.00
03/08/21	M. Betinsky	Work on draft Rule 26(f) report.	1.70	\$901.00
03/09/21	R. Bennett	Telephone conference with client re: status	0.30	\$256.50
03/10/21	R. Bennett	Telephone conference with Andy Noel re verdict comparison and mediation results [.4]; email Sarff [.3].	0.70	\$598.50
03/10/21	A. Noel	telephone conference with RB re voir dire comparison and mediation results [.4]	0.40	\$292.00

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03/11/21	R. Bennett	Review SRN order in detail [1.0]; telephone conference with Marc Betinsky re action plan -next steps, Rule 26f and review draft Rule 26f [1.0].	2.00	\$1,710.00
03/11/21	M. Betinsky	Complete draft Rule 26(f) report and email same to CRG (2.5); review Judge Nelson's order on motion to dismiss, T/Cs with RB re same (1.0), obtain and review similar orders in Samaha and Armstrong matters (.8), emails CRG re strategy and next steps following same (.2).	4.50	\$2,385.00
03/11/21	A. Koob	Receive and review updated billing from M Health and update billing index regarding same [.4]; review of file, bills, appointments and subrogation information/itemizations, email to RB and KHB regarding update of billing and medical records requests, telephone call to Hennepin Health requesting updated itemization and question about potential duplicate item on itemization (left voice mail), telephone call to MN DHS requesting updated itemization (left voice mail) [1.6].	2.00	\$460.00
03/12/21	R. Bennett	Conference with Andy Noel re effect of Floyd settlement [.3]; telephone conference with client to answer questions [.3].	0.60	\$513.00
03/12/21	A. Noel	Review draft Rule 26 and online research re ID angles [1.7]; conference with RB re: GF settlement [.3]	2.00	\$1,460.00
03/12/21	M. Betinsky	Research LA Times article re police conduct in George Floyd protests and study published in same, review same.	1.00	\$530.00
03/13/21	M. Betinsky	Review emails from Soren re CUAPB litigation and order and messages CRG re same.	0.30	\$159.00
03/15/21	R. Bennett	Conference with Andy Noel re state court order [.3]; prepare for and attend zoom meeting re discovery plan of action [1.6].	1.90	\$1,624.50
03/15/21	A. Noel	Conference with team re discovery.	0.80	\$584.00
03/15/21	K. Bennett	Review Rule 26(f) report.	0.50	\$342.50
03/15/21	K. Bennett	Civil rights conf re: discovery/plan/strategy.	0.80	\$548.00
03/15/21	M. Betinsky	Zoom with CRG re strategy for discovery and draft Rule 26(f) report (.8); work on revisions to same (.9)	1.70	\$901.00

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03/15/21	A. Koob	Receive and review updated subrogation letter from MN DHS.	0.10	\$23.00
03/16/21	R. Bennett	Telephone conference with Marc Betinsky re Rule 26f draft [.3]; review and consider Rule 26f report draft and issue comments thereto [1.0]; telephone conference with Marc Betinsky re changes and additions to Rule 26f report [1.0]; review proposed changes and telephone conference with Marc Betinsky [.4]; telephone conference with Marc Betinsky re additional adds [.3].	3.00	\$2,565.00
03/16/21	M. Betinsky	T/C with RB re potential discovery aimed at identifying John Doe Defendants and adjustments to 26(f) report (1.0); revisions to 26(f) report and follow-ups with RB (1.3); review CUAPB lawsuit order and discuss potential impact for Soren (.5); review order for PTC an emails re scheduling/attending same (.2).	3.00	\$1,590.00
03/17/21	R. Bennett	Review draft Rule 26f report carefully [.5]; telephone conference with Marc Betinsky re changes and protective order [.6]; review Marc Betinsky draft of protective order [.6].	1.70	\$1,453.50
03/17/21	K. Bennett	Review emails re: Rule 26(f) and discovery from MEB and Sarff and plan response.	1.00	\$685.00
03/17/21	M. Betinsky	Draft potential protective order, edits to draft 26(f) report, and email all documents to Sarff (1.3); Email from Sarff re 26(f) planning meeting and discuss response (.2); conference with RB re: edits (.6)	2.10	\$1,113.00
03/18/21	R. Bennett	Emails to/from Marc Betinsky re Rule 26f and protective order [.6]; telephone conference with client [.4].	1.00	\$855.00
03/18/21	M. Betinsky	Work on officer identification document requests and interrogatories.	0.70	\$371.00
03/19/21	R. Bennett	Telephone conference with Marc Betinsky re interros and phased discovery.	0.60	\$513.00
03/19/21	A. Noel	Review email correspondence with Sarff [.7]; telephone conference with Marc Betinsky re same [.4]	1.10	\$803.00
03/19/21	M. Betinsky	Work on officer identification discovery (3.0); conference with RB re: same (.6); conference with AJN re: Sarff email (.4)	4.00	\$2,120.00

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03/21/21	R. Bennett	Review NYT article and appended studies [1.2]; email CRT [.3].	1.50	\$1,282.50
03/22/21	R. Bennett	Telephone conference with Andy Noel [.4]; review Marc Betinsky draft interrogatories [1.2]; review Marc Betinsky request for production of documents [1.1]; calls re: same with MEB [.3]	3.00	\$2,565.00
03/22/21	A. Noel	Review NYT and other media reports re MPD. indiscriminate use of force [1.3]; conference with RB re: NYT article [.4]	1.70	\$1,241.00
03/22/21	K. Bennett	Review LAPD Report and take notes re: discovery ideas for Stevenson [2.0].	2.00	\$1,370.00
03/22/21	M. Betinsky	Draft, edit and revise officer identification interrogatories and document requests, incorporate changes from KHB, T/C with RB and edits to discovery requests per same (4.0); T/C RB re strategy for 26(f) and discovery requests, issue with interrogatory subparts, brief research on same (.6).	4.60	\$2,438.00
03/23/21	R. Bennett	Review city's answer in Tirado.	1.00	\$855.00
03/23/21	K. Bennett	Review MEB's draft ID discovery [.4].	0.40	\$274.00
03/23/21	M. Betinsky	Legal research in 8th Circuit on discrete subparts for interrogatories under Rule 33 and email RB re same (2.0); emails re 26(f) meeting and planning (.2); review answer in Tirado and comparison to Complaint and emails CRG re same (1.0).	3.20	\$1,696.00
03/25/21	R. Bennett	Telephone conference with Randy Furst re Minneapolis city council [.5]; email Andy Noel/Marc Betinsky re Rule 68 issues [.8]; review answer in detail [1.5].	2.80	\$2,394.00
03/25/21	M. Betinsky	Brief review of answer.	0.30	\$159.00
03/26/21	R. Bennett	Further analysis of answer[.9]; conference with Marc Betinsky re answer defenses - strategy going forward and Rule 11 issues for the City [.8]; review Marc Betinsky complaint/answer comparisons and memo [1.6]; telephone conference with Marc Betinsky and Katie Bennett re relief [.5]; conference with Andy Noel re motion to strike [.5].	4.30	\$3,676.50
03/26/21	A. Noel	Review answer [1.4] and telephone conference with RB re: motion to strike [.5]	1.90	\$1,387.00

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Date	Timekeeper	Description	Hours	Fees
03/26/21	K. Bennett	Review comparison of Answer to Complaint and emails re: same [1.2]; conference with RB/MEB re same [.5]	1.70	\$1,164.50
03/26/21	M. Betinsky	Prepare comparison of Answer to Amended Complaint and circulate same to CRG, emails with CRG re allegations in Answer and potential Rule 11 letter (2.5); conference call with RB/KHB re same (.5)	3.00	\$1,590.00
03/29/21	R. Bennett	Telephone conference with Marc Betinsky re service of discovery [.4]; telephone conference with Marc Betinsky re Rule 11 letter [.3]; telephone conference with Marc Betinsky re pictures and numbering [.3]; prepare for zoom meeting - Rule 26f and attend same [.9]; review Rule 68 and zoom conference with client [1.0]; telephone conference with CRT re action plan [1.0]; telephone conference with Randy Tietjen re Rule 11 and motion [.5]; review A. Koob email re bills and liens [.3]; telephone conference with Ronn Kreps re status post Rule 69 offer [.4].	5.10	\$4,360.50
03/29/21	A. Noel	Email correspondence with team re Sarff meeting.	0.70	\$511.00
03/29/21	K. Bennett	Update from MEB re: conf with Sarff [.2]Review Rule 68 offer [.3]Prep for call with client re: Rule 68 offer and plan [.3]Conference with client with MEB, RB re: Rule 68 and plan [1.0]Conference with MEB and RB re: action plan [1.0]Review discovery served today [.8].	3.60	\$2,466.00
03/29/21	M. Betinsky	Review materials and prep for 26(f) planning meeting (1.2); T/C with RB re same (.4); 26(f) planning meeting with Sarff et al (.7); finalize discovery requests, T/C with RB re same, prep cover letter and oversee service of same (1.2); conference with RB re Rule 11 letter and answer (.3); review offer of judgment and conference with RB/KHB re same (1.0); Zoom conference with client and CRG re offer and response, action plan (1.0); work on Rule 11 letter (.8); emails re lien info (.2).	6.80	\$3,604.00

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03/29/21	A. Koob	Emails from/to MEB regarding photo exhibits for discovery requests, prepare photos for exhibits to discovery requests and email same to MEB [.4]; finalize officer identification interrogatories and attach photo exhibits to same [.2]; emails to/from MEB and finalize officer identification requests for production and email same to MEB [.2]; review email from RB regarding costs and respond to same, review email from KHB regarding subrogation and respond to same [.2].	1.00	\$230.00
03/30/21	R. Bennett	Telephone conference with Teresa McClain re: Rule 68 offer [.3]; telephone conference with Weyandt re: Rule 68 offer [.4]; email to team re offer thoughts re same [.4].	1.10	\$940.50
03/30/21	K. Bennett	Review lien info from ATK and circulate amounts to team for evaluation [.5]Emails with ATK re: hospital DOI treatment and Brave Choices [.3]Review email re: strategy from RB [.3].	1.10	\$753.50
03/30/21	M. Betinsky	Review lien information (.2); work on Rule 11 letter (.8); emails re offer of judgment and strategy (.4).	1.40	\$742.00
03/30/21	A. Koob	Review email from KHB and review of file materials relating to subrogation/lien, telephone call to Hennepin Health requesting updated itemization, email to Hennepin Health regarding same, respond to KHB email with updated information on Hennepin Health and subrogation information [.6]; additional email to KHB regarding Brave Choices records request and submit request for updated records/bills from Brave Choices [.2]; telephone call to M Health to check payment status of DOI hospitalization [.3]; check on status of outstanding Anesthesia billing request [.1]; telephone call and left message with MN DHS regarding DOI hospitalization and email KHB regarding same [.1]; telephone call from MN DHS regarding DOI claims and email update to KHB [.2]; receive and review updated costs/fees spreadsheet and forward same to RB, KHB, MEB [.1]; receive and begin review of updated M Health records [1.1].	2.70	\$621.00
03/31/21	R. Bennett	Review facts and Rule 68 in Form II meeting of PI/Med Mal practice group [.5]; telephone conference with client [.5].	1.00	\$855.00

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Date	Timekeeper	Description	Hours	Fees
04/01/21	K. Bennett	Review email from ATK re: surgery dates and review file/reply; emails with RB/ATK/client [.5].	0.50	\$342.50
04/01/21	M. Betinsky	Work on Rule 11 letter.	0.70	\$371.00
04/01/21	A. Koob	Complete review of updated MHealth records and update MHealth medical records memo and medical summary, review billing records regarding past surgeries and emails from RB regarding past/upcoming appointments, emails to/from RB and KHB regarding 1.20.21 surgery cancellation - confirmed by client.	2.40	\$552.00
04/02/21	R. Bennett	Review the City's rule 26f proposals [.6]; telephone conference with Marc Betinsky re same [.5]; prepare response to Rule 26f [.5]; review defendants' discovery [1.0]; telephone conference with Marc Betinsky re initial responses [.4]; emails to/from client [.6]; voice mail Sarff [.2].	3.80	\$3,249.00
04/02/21	A. Noel	Review Rule 26 drafts and offer comments, analysis and ideas	1.50	\$1,095.00
04/02/21	M. Betinsky	Review City's document requests and interrogatories to Soren, emails with Soren re same, review Soren's documents, T/C with RB re same and responses, begin formulating responses (2.4); review City's proposed changes to 26(f) report and protective order, emails with RB re same, strategize response and begin working on same (1.8).	4.20	\$2,226.00
04/04/21	R. Bennett	Review Marc Betinsky draft Rule 26f report and email back/forth.	1.00	\$855.00
04/04/21	M. Betinsky	Work on revisions to 26(f) in light of Sarff's comments, emails with RB re same, review changes to proposed protective order and work on same.	1.80	\$954.00
04/05/21	R. Bennett	Review and revise Rule 26f and comments [.5]; telephone conference with Marc Betinsky [.5]; review protective order and comments in detail [.8] and telephone conference with Marc Betinsky re same [.2].	2.00	\$1,710.00
04/05/21	M. Betinsky	Complete revisions to 26(f); further revisions to same (1.3); Review and revise draft protective order following Sarff's changes to same (2.3); emails and T/Cs with RB re PO and 26(f) [.7]; emails to Sarff re PO and 26(f)(.7); work on letter to Sarff re Answer (1.5).	6.50	\$3,445.00

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04/05/21	A. Koob	Receive and review emails from MEB regarding discovery and additional materials from client [.1]; begin to work on drafting discovery response templates for Response to Request for Production and Answers to Interrogatories, brief review of materials from client [1.9].	2.00	\$460.00
04/06/21	R. Bennett	Telephone conference with Katie Bennett.	0.30	\$256.50
04/06/21	K. Bennett	telephone conference with RB re: discovery [.3]	0.30	\$205.50
04/06/21	M. Betinsky	Attention to RRFPDs and ATIs and documents from Soren for same (1.0); additional work on letter to Sarff re Answer and messages AJN re same (.4).	1.40	\$742.00
04/06/21	A. Koob	Finalize draft discovery responses outline and forward same to MEB [.2]; telephone call to MHealth Billing Office to check on 1.20.21 surgery on bill, but did not go forward due to testing positive for COVID [.6].	0.80	\$184.00
04/08/21	R. Bennett	Telephone conference [.3] with Marc Betinsky and draft reply [.7].	1.00	\$855.00
04/08/21	A. Noel	Telephone conference with Bob Bennett re demand and Rule 68.	1.00	\$730.00
04/08/21	M. Betinsky	T/C with RB re settlement discussions with Sarff [.3] , research California settlement cited by City and emails with RB re response to Sarff [.7]	1.00	\$530.00
04/08/21	A. Koob	Review email/article from RB regarding non-lethal projectiles, begin to work on redaction of production for discovery responses from client (screen shots and links).	1.20	\$276.00
04/12/21	R. Bennett	Telephone conference with Andy Noel re City of Mpls. stall/low ball antics [.3]; telephone conference with Katie Bennett re City of Mpls. stall/low ball antics [.3]; telephone conference with client [1.0].	1.60	\$1,368.00
04/12/21	K. Bennett	conf with RB re: Rule 68/strategy [.3]	0.30	\$205.50
04/13/21	M. Betinsky	Emails with Sarff re 26(f) report and proposed changes (.2); emails A. Koob re docs for discovery responses (.2).	0.40	\$212.00

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04/13/21	A. Koob	Review Hennepin Health materials and telephone call to Hennepin Health to again check status of request for updated itemization and request to speak with someone regarding potential duplication on original itemization [.2]; review redacted Tweets/Facebook screen shots and review links sent by client and prepare document with links for potential use in responses to discovery requests, email same to MEB [.6].	0.80	\$184.00
04/14/21	M. Betinsky	Emails Sarff re 26(f) (.1); emails re latest medicals and billing (.1).	0.20	\$106.00
04/14/21	A. Koob	Receive and review University Anesthesia Providers billing and compare to itemizations from MN DHS and Hennepin Health received to date, general review of itemizations for missing any missing bills, update billing index and request index and update email to RB, KHB and MEB.	1.10	\$253.00
04/15/21	R. Bennett	Review Marc Betinsky email and telephone conference with Marc Betinsky re disclosures [.6]; telephone conference with Marc Betinsky re Rule 26f - settlement position differences [.3].	0.90	\$769.50
04/15/21	M. Betinsky	Emails with Sarff re 26(f) report, revisions to same and finalize, emails re protective order (1.0); emails and calls with A. Koob and work on preparing documents for production with initial discovery requests & responses to same (.7); multiple conf with RB re: disclosures and settlement positions/Rule 26 (.4)	2.10	\$1,113.00
04/15/21	A. Koob	Review email from MEB regarding redactions, review redacted documents and email MEB [.1]; telephone call with MEB regarding discovery responses [.1]; redact additional item on Facebook post and email to MEB regarding same [.1].	0.30	\$69.00
04/16/21	M. Betinsky	Begin drafting letter to Judge TNL in advance for Rule 16 conference.	0.50	\$265.00
04/18/21	M. Betinsky	Continue work on letter to Judge TNL in advance of Rule 16 conference.	1.50	\$795.00
04/19/21	R. Bennett	Text/email Soren re job application and status [.4]; review job offer letter and other materials [.6]; review and revise letter to Judge TNL [.8].	1.80	\$1,539.00

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04/19/21	M. Betinsky	Complete draft letter to Judge TNL, revise and edit same and send same to RB (2.5); email client, work on responses to interrogatories and document requests (.5); call with ATK re: discovery (.1)	3.10	\$1,643.00
04/19/21	A. Koob	Telephone call with MEB regarding discovery responses [.1]; receive and review email from K. Baldwin at MN DHS, review subrogation materials received to date and respond to same, review additional email from MN DHS regarding subrogation amount and respond to same [.3].	0.40	\$92.00
04/20/21	R. Bennett	Revise letter to MJ TNL [.5] and telephone conference with Marc Betinsky [.3]; text and email to client [.5]; telephone conference with client [.4].	1.70	\$1,453.50
04/20/21	M. Betinsky	Emails with Soren re discovery responses, review documents from Soren, work on responses to interrogatories and document requests, emails with A. Koob re same (1.3); T/C with RB re edits to letter to Judge TNL(.3), further changes to same and final hard review of letter (.9).	2.50	\$1,325.00
04/20/21	A. Koob	Review emails with texts from MEB/client for discovery responses.	0.10	\$23.00
04/21/21	M. Betinsky	Work on discovery responses and review materials from Soren for conference call (.7); emails Sarff re 26(f) report (.2).	0.90	\$477.00
04/22/21	M. Betinsky	Call with Soren to discuss discovery responses and needed documents, review documents from Soren, work on discovery responses and emails with Soren/A. Koob re same (2.7); finalize and send letter to Judge TNL for Rule 16 conference (.3); review and edit 26(f) for filing, emails with Sarff re same and attention to filing (.5).	3.50	\$1,855.00
04/22/21	A. Koob	Work on preparing screen shots from Soren for production with discovery responses and prepare texts received to include with discovery responses, start working on medical/billing records to be produced with discovery responses.	2.60	\$598.00
04/25/21	M. Betinsky	Emails with Soren re discovery responses.	0.30	\$159.00
04/26/21	M. Betinsky	Review documents for RRFPDs, meetings with A. Koob re same, work on discovery responses, meet with Soren re ATIs, numerous emails re same.	4.00	\$2,120.00

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04/26/21	A. Koob	Review of all file materials and add additional materials to T Drive for potential production, emails to MEB regarding same [1]; office conference with MEB to go through documents for production in response to discovery requests [.3]; receive and review large number of additional group chat screen shots from client and begin to prepare for Bates numbering and production [6.6].	7.90	\$1,817.00
04/27/21	R. Bennett	Conference with Marc Betinsky/Katie Bennett re discovery responses and review email.	0.70	\$598.50
04/27/21	K. Bennett	Review emails re: text messages/group chats [.4] and discuss same with MEB/RB [.3]	0.70	\$479.50
04/27/21	M. Betinsky	T/C with client re discovery (.3); emails re same and additional documents for production (.3); emails with A. Koob re privilege log (.3); work on interrogatory responses and document responses and email draft to client (4.5); emails with A. Koob re documents for production, emails CRG re same and T/C with RB/KHB re same (.6).	6.00	\$3,180.00
04/27/21	A. Koob	Email update to MEB regarding group chat texts and information within text string [.6]; continue to organize materials/records for production with discovery responses, including Bates numbering and redaction of records [7.9]; receive, review, bates number additional documents from client and prepare privilege log regarding same [.8].	9.30	\$2,139.00
04/27/21	C. Sullivan	Preparation of photo graphics per A. Koob.	1.00	\$280.00
04/28/21	R. Bennett	Telephone conference with Marc Betinsky re Rule 16 and TNL.	0.30	\$256.50
04/28/21	M. Betinsky	Revisions to discovery responses and privilege log, T/C with RB re responses (.3), brief legal research re contention interrogatories for same (.7).	1.00	\$530.00
04/29/21	R. Bennett	Review court order.	0.40	\$342.00
04/29/21	M. Betinsky	Numerous emails with Soren re interrogatory responses, review additional documents for RFPDs, email A. Koob re production set and Bates stamping, revise interrogatory responses and responses to RFPDs (1.4); emails with Sarff re protective order and filing same (.2).	1.60	\$848.00

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04/30/21	K. Bennett	Review email from MEB and call with MEB re: status of discovery responses and next steps for Monday.	0.40	\$274.00
04/30/21	M. Betinsky	Emails with Soren re finalizing interrogatory responses, modifications to same and document responses(.4), emails K. Bennett and A. Koob re serving same (.3)	0.70	\$371.00
05/01/21	M. Betinsky	Final edits to interrogatories and email KHB.	0.20	\$106.00
05/03/21	R. Bennett	Review responses [1.0]; telephone conference with Andy Noel and Marc Betinsky [.5]; further conference with Marc Betinsky and Andy Noel [.4].	1.90	\$1,624.50
05/03/21	K. Bennett	Review/finalize discovery responses and emails with ATK/MEB.	0.70	\$479.50
05/03/21	M. Betinsky	Review defendants' ATI and RRFPD, partial review of bodycam videos in production, T/C with RB/AJN re strategy for response and impact on Rule 16 conference (.9), research issues regarding improper response, draft and send email regarding deficiencies in response (1.6); email re finalization of interrogatory and document responses and service of same (.3).	2.80	\$1,484.00
05/03/21	A. Koob	Review emails from MEB regarding discovery responses, review new screenshots from client and prepare for production, convert to PDF and bates number the same and go through documents to produce and remove evidence chain documents and re-number all documents for production due to removal, finalize documents for production, update Privilege Log, finalize Answers to Interrogatories and Response to Requests for Production with updated Bates numbers, email KHB and MEB regarding same [3.2]; emails with KHB and MEB regarding discovery responses, telephone call to KHB regarding service and Privilege Log, prepare certificate of service and service letter and forward same to KHB, upload documents for emailing and prepare flash drive with documents being produced, finalize materials for service and serve same via mail and email [1.7].	4.90	\$1,127.00
05/04/21	R. Bennett	Being review defendants' documents which are produced en masse without organization.	5.80	\$4,959.00

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05/04/21	K. Bennett	Review Defendants' discovery responses [1.5]Review MEB's notes/takeaways [.5]Review hot doc from RB/ATK [1.5].	3.50	\$2,397.50
05/04/21	M. Betinsky	Review documents from City's document production, messages with CRG re same and identification of shooter, strategize next steps.	1.80	\$954.00
05/04/21	A. Koob	Review email from MEB with document production from defendants, emails to/from MEB, attempt to download document production from defendants, email to J. Hanslick to request access to documents, receive same and again attempt to download large production from defendants [3.2]; telephone call with RB regarding report in documents produced by defendants [.2]; emails to/from J. Hanslick regarding documents produced [.2]; submit requests for Urology and Dr. Watercott records and update request index [.3].	3.90	\$897.00
05/05/21	R. Bennett	Conference with Marc Betinsky and review email [1.0]; review MPD and Arradondo discovery responses [1.0].	2.00	\$1,710.00
05/05/21	K. Bennett	Continue review of hot docs and drafting memo of locations/players [3.5].	3.50	\$2,397.50
05/05/21	M. Betinsky	Continued review of materials from Sarff, emails re same (.8); T/C with RB re Rule 16 conference and follow-up email (.2).	1.00	\$530.00
05/06/21	R. Bennett	Review various BWC and Police reports[.6] and lengthy telephone conference with Marc Betinsky [2.4]; prep for and attend Rule 16 hearing [1.8]; telephone conference with Katie Bennett re strategy [.4].	5.20	\$4,446.00
05/06/21	K. Bennett	Review production from Defendants - finalize memo on hot doc reports [2.5]review emails from MEB [.3]Review key videos [2.5]Discuss ideas for conference with RB [.4]Discuss findings with MEB [.2].	5.90	\$4,041.50
05/06/21	M. Betinsky	Review KHB memo re police reports in City's document production and T/C KHB re same (.5) , review bodycams received from City (.2), T/C with RB re same and shooter identification(2.4), emails RB/KHB re Rule 16 conference and follow-up T/C with RB (.1)	3.20	\$1,696.00

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05/06/21	A. Koob	Finalize downloading/unzipping of large amount of videos/docs produced by defendants and telephone call with MEB regarding videos.	1.20	\$276.00
05/07/21	R. Bennett	Telephone conference with Andy Noel re shooter ID strategy [.3]; telephone conference with Marc Betinsky re shooter ID strategy [.3]; telephone conference with Katie Bennett re shooter ID strategy [.3].	0.90	\$769.50
05/07/21	A. Noel	telephone conference with RB re: strategy [.3]	0.30	\$219.00
05/07/21	K. Bennett	telephone conference with RB re: strategy [.3]	0.30	\$205.50
05/07/21	M. Betinsky	Continued review of bodycam footage received from City and T/C with RB re same.	2.00	\$1,060.00
05/07/21	P. McCaffrey	Video work and editing on a police video attempt to clean up video and locate data attorneys requested.	1.00	\$295.00
05/09/21	M. Betinsky	Continued review and assimilation of defendants' body cam videos.	2.70	\$1,431.00
05/10/21	R. Bennett	Telephone conference with Marc Betinsky re courts - proof standard - and comfortable with naming J. Doe #1 [.6]; prepare for and attend zoom meeting with CRT [1.2]; telephone conference with Sarff [.3]; telephone conference with client [.4].	2.50	\$2,137.50
05/10/21	A. Noel	Review documents/emails/BWC footage/reports re ID.	2.70	\$1,971.00
05/10/21	A. Noel	meeting team re: plan for complaint [1.0]	1.00	\$730.00
05/10/21	K. Bennett	Review video evidence in order to draft amended complaint [2.5]Meeting with MEB/RB/AJN/ATK re: plan for complaint moving forward [1.0]Strategize re: next steps/best course for confirming shooter [1.2]Review McCann video and draft memo [2.0]Review Bauer video and draft memo [2.8].	9.50	\$6,507.50
05/10/21	M. Betinsky	ZOOM with CRG re bodycam videos and other documents received from city (1.0), strategy for John Does and claims in Complaint, and next steps (.8): continued review of materials from city (.7); call with RB re: proof standard (.6)	3.10	\$1,643.00
05/10/21	A. Koob	Begin to work on draft of Initial Disclosures.	1.50	\$345.00

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05/10/21	A. Koob	Attend Zoom meeting with RB, KHB, AJN and MEB regarding strategy moving forward.	1.00	\$230.00
05/11/21	R. Bennett	Telephone conference with Jack Ryan [1.0]; telephone conference with Marc Betinsky re research issues raised by J. Ryan [.6]; review MN unlawful assembly research memo [.6].	2.20	\$1,881.00
05/11/21	K. Bennett	Begin review of Jensen's video and draft memo re: same [1.5].	1.50	\$1,027.50
05/11/21	M. Betinsky	T/C with RB re mandated warning language (.6), legal research regarding same and Minnesota statutes, draft update email to CRG re same, emails with Jack Ryan regarding same (4.1)	4.70	\$2,491.00
05/11/21	N. Adler	Background research on Benjamin Bauer, correspond with Andy Noel.	1.70	\$374.00
05/12/21	R. Bennett	Conference with CRT and Cade and Adler [1.5]; telephone conference with Dick Allyn re: Darcy Klund (Strike 1) [1.0]; telephone conference with Andy Noel [.4]; telephone conference with client [.5]; call with RB re: deadlines [.2]	3.60	\$3,078.00
05/12/21	A. Noel	Review Jack Ryan input and emails.	2.10	\$1,533.00
05/12/21	K. Bennett	Civil rights meeting re: Stevenson discovery and videos with Adler and Cade [1.5] Continue review of MPD videos (Jensen/Seeley) for drafting of amended complaint/draft memo re: same [4.0]; follow-up call with MEB re: same [.2]	5.70	\$3,904.50
05/12/21	M. Betinsky	Zoom with CRG, N. Adler, B. Cade re bodycam videos, police practices, strategy, etc. (1.5); follow-up T/C with KHB (.2); review protective order and T/C with RB re same and impending scheduling order (.2); emails with Jack Ryan re mandated assembly warnings and uses of force, contents of same and review materials and PPT from Jack (.7).	2.60	\$1,378.00
05/12/21	N. Adler	Team meeting [1.5] work on Benjamin Bauer background [.5]	2.00	\$440.00
05/12/21	B. Cade	Case review/police reports and video review.	1.00	\$220.00

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05/13/21	R. Bennett	Review Adler report on Benjamin Bauer [.8]; review BWC video [2.2]; zoom meeting with N. Adler, Katie Bennett and Andy Noel [.9]; correspondence to Sieff [.4]; (review Sarff email and respond) email Sarff; discuss Sarff emails with KHB [.9].	5.20	\$4,446.00
05/13/21	A. Noel	Review docs and protective order and telephone conference with team.	1.70	\$1,241.00
05/13/21	K. Bennett	Continue review of Seely's BWC/draft memo re: same [3.0] Zoom meeting re: same/identity of shooter with AJN/RB and Nick Adler [.9] Review memo re: Bauer from Nick Adler [1.0] Review emails to and from Sarff re: Stevenson and discuss with RB [.5].	5.40	\$3,699.00
05/13/21	M. Betinsky	Emails RB/Sarff re discovery issues and deficiencies (.2); brief review of Bauer background report (.2); email re updated Brave Choices (.1).	0.50	\$265.00
05/13/21	A. Koob	Telephone call to Hennepin Health to request updated itemization [.2]; call to M Health to check status of 1.20.21 surgery charge that should be removed from bills (no surgery done due to positive COVID test) and check status of 5.31.20 hospitalization bills, whether or not paid by insurance [.2]; begin review of updated Brave Choice records received, prepare summary of updated Brave Choices records, update medical summary with Brave Choices records, and email summary to KHB, MEB and RB, review updated Brave Choices billing records and updates to billing index and request index [2.9].	3.30	\$759.00
05/13/21	A. Koob	Work on draft/updates to Initial Disclosures.	0.40	\$92.00
05/13/21	N. Adler	Finish Background on Bauer [1.1]; review reports and videos, meet with team [.9]	2.00	\$440.00
05/14/21	R. Bennett	Review Sarff email and respond after conference with CRT [1.2]; telephone conference with Katie Bennett x3 re amended complaint [1.3]; new BWC video [.9].	3.40	\$2,907.00

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05/14/21	K. Bennett	Begin review of Hanneman's BWC video and draft memo re: same/prep for amending complaint [2.2] Continue review of additional BWC and draft notes/memo to prep for amending complaint [5.7]; conf with RB re: video/complaint amendments [1.7]	9.60	\$6,576.00
05/14/21	M. Betinsky	Emails CRG re bodycam videos and confidential designations (.3); review pretrial scheduling order and deadlines (.2).	0.50	\$265.00
05/17/21	R. Bennett	Continued review of discovery materials.	1.60	\$1,368.00
05/17/21	K. Bennett	Review discovery from Defendants [all documents] [2.0]Review discovery from Defendants [BWC for additional pertinent videos] [6.8].	8.80	\$6,028.00
05/17/21	M. Betinsky	Review KHB email re org chart/chain of command and emails CRG re strategy for named defendants in amended complaint.	0.40	\$212.00
05/17/21	A. Koob	Review Pretrial Scheduling Order from Court; receive and review updated itemization from Hennepin Health and go through to compare with bills already received.	0.70	\$161.00
05/17/21	A. Koob	Continue to work on draft of Rule 26 Initial Disclosures.	0.80	\$184.00
05/18/21	R. Bennett	Telephone conference with Katie Bennett/Sarff [.5]; telephone conference with Katie Bennett [.4]; further review of BWC evidence [1.2].	2.10	\$1,795.50
05/18/21	K. Bennett	Review discovery from Defendants [all documents] [4.5]Review discovery from Defendants [BWC for additional pertinent videos] [2.5]Call with RB re: discovery issues [.4]Conf call with Sarff and RB re: discovery issues, plan and complaint/next steps [.5]Review MPD training review of Bauer [.6]Create diagram of van and placement at time of shooting [1.0]Email Sarff re: list of videos [.3].	9.80	\$6,713.00
05/18/21	M. Betinsky	Emails CRG/Sarff re confidential designation on bodycams and list for removal (.4), review KHB email re shooting lineup/orientation (.2), brief review of draft initial disclosures (.2).	0.80	\$424.00
05/18/21	A. Koob	Continue to work on draft of Rule 26 Initial Disclosures and preparing additional documents to be produced, forward draft Initial Disclosures to MEB and emails with MEB regarding same.	4.20	\$966.00

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05/19/21	R. Bennett	Zoom CRT [1.5]; review amended complaint in detail [2.1].	3.60	\$3,078.00
05/19/21	A. Noel	Conference with team re approach with amended complaint and confidential designations	1.50	\$1,095.00
05/19/21	K. Bennett	Continue to draft amended complaint [4.3]Circulate current draft to team ahead of mtg [.2]Zoom meeting with civil rights team to review Complaint, edits/strategy and motion re: confidential designation [1.5].	6.00	\$4,110.00
05/19/21	M. Betinsky	Review draft Amended Complaint (1.5), ZOOM with CRG re same and strategy for claims and changes to same (1.5)	3.00	\$1,590.00
05/20/21	R. Bennett	Telephone conference with Katie Bennett and review BWC screenshots [.6]; telephone conference with Marc Betinsky re 40 BIP rounds [.6]; continued review and edits on amended complaint [1.1].	2.30	\$1,966.50
05/20/21	K. Bennett	Review New England Journal letter/appendix.	0.80	\$548.00
05/20/21	K. Bennett	Continue drafting amended complaint [2.8] Continue review of Bauer video [1.2] Research re: BIP round on Bauer video [1.2] Zoom and calls with Marc to review research and compare to evidence at scene [.4]; calls with RB re: BWC screenshots [.6]	6.20	\$4,247.00
05/20/21	M. Betinsky	T/Cs with KHB, RB, Zoom with KHB re body cam videos and clarifying allegations/claims for amended complaint naming the John Doe defendants (.4), review materials produced by City regarding same (1.6)	2.00	\$1,060.00
05/21/21	R. Bennett	Telephone conference with Andy Noel re inclusion of Angerhofer as a defendant [.5]; telephone conference with Katie Bennett re drafting sections of amended complaint [.5]; review 5/21/21 draft amended complaint [2.0]; draft new section of amended complaint [.8].	3.80	\$3,249.00
05/21/21	A. Noel	telephone conference with RB/MEB re: inclusion of Angerhofer [.5]	0.50	\$365.00
05/21/21	K. Bennett	Continue review of New England Journal and discuss same with with RB [.8] Review PowerPoint from Jack Ryan [2.0] .	2.80	\$1,918.00

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05/21/21	K. Bennett	Continue strategizing and drafting amended complaint [3.6]Email updated draft to RB [.2].	3.80	\$2,603.00
05/21/21	M. Betinsky	telephone conference with RB/AJN re: inclusion of Angerhofer [.5]	0.50	\$265.00
05/23/21	M. Betinsky	Review and edit draft initial disclosures and email A. Koob re same.	0.50	\$265.00
05/24/21	R. Bennett	Review amended complaint 5/24 draft [2.0]; zoom meeting with Katie Bennett re editing first amended complaint [1.5].	3.50	\$2,992.50
05/24/21	K. Bennett	Continue editing amended complaint and email to RB [2.3]Review voice mail from RB and schedule meeting time to review amended complaint [2]Meeting with RB re: amended complaint [1.5].	4.00	\$2,740.00
05/24/21	M. Betinsky	Emails with Soren/A. Koob re information needed for initial disclosures.	0.20	\$106.00
05/24/21	A. Koob	Review email from MEB regarding Initial Disclosures and updates to same, email to KHB/RB regarding contact information and email to client requesting additional information.	0.80	\$184.00
05/25/21	R. Bennett	Conference with Katie re complaint [.4]; telephone conference with Marc Betinsky re his review and edits [.6].	1.00	\$855.00
05/25/21	K. Bennett	Circulate updated amended complaint to team [.2] Discuss amended complaint and plan with MEB [.2]; conf with RB re: same [.4]	0.80	\$548.00
05/25/21	M. Betinsky	Review, revise and redline Amended Complaint and emails with CRG re same (4.5); conf with RB re: same (.6)	5.10	\$2,703.00
05/26/21	K. Bennett	Review MEB red lined complaint [1.8]Zoom meeting re: red lined complaint [.5].	2.30	\$1,575.50
05/26/21	M. Betinsky	ZOOM with CRG re questions in amended complaint (.5), work on editing/modifying same (1.0)	1.50	\$795.00
05/27/21	M. Betinsky	Emails with Sarff re confidential designation on docs, emails A. Koob re same, emails and T/C with A. Koob re initial disclosures and needed info from Soren (.6); work on revisions to Amended Complaint (1.0).	1.60	\$848.00

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05/27/21	A. Koob	Telephone call with MEB regarding Initial Disclosures and forward Brave Choices invoice regarding legal consult [.2]; emails from/to MEB regarding CONFIDENTIAL stamps for previously produced medical records, stamp confidential updated Brave Choices records and stamp CONFIDENTIAL all medical records previously produced, email updated CONFIDENTIAL stamped records to opposing counsel [1.8]; receive and review billing records from HCMC, email to MEB regarding HCMC records, update billing index, redact and Bates number HCMC records for production with Initial Disclosures and updates to Initial Disclosures [.8]; review emails from RB, MEB and defendants' counsel regarding documents re-produced, zip file of imaging and re-send along with Midwest Laboratories records to defense counsel per request [.4].	3.20	\$736.00
05/28/21	M. Betinsky	T/C with Soren regarding information for initial disclosures, edit same and emails with A. Koob re same (.4); complete revisions to Amended Complaint and circulate same (1.5).	1.90	\$1,007.00
05/30/21	R. Bennett	Review Marc Betinsky red line/final revisions.	1.50	\$1,282.50
05/30/21	M. Betinsky	Emails re timing of filing Amended Complaint and meet/confer with Sarff re confidentiality designations.	0.20	\$106.00
06/01/21	A. Noel	Review and revise Marc Betinsky revisions to amended complaint.	1.70	\$1,241.00
06/01/21	K. Bennett	Review redlined complaint [1.0]Finalize complaint, email Sarff re: first amended complaint plan/dates and times for meet and confer [.7].	1.70	\$1,164.50
06/01/21	M. Betinsky	Finalize initial disclosures and attention to service of same, emails A. Koob re same (.4); emails A. Koob and Sarff re Dr. Sher report and misdesignation and attention to service of newly marked confidential copy (.3).	0.70	\$371.00

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06/01/21	A. Koob	Review email from MEB regarding additions to Initial Disclosures, update/finalize draft of Initial Disclosures and forward same to MEB for review [1.5]; emails to/from MEB regarding Dr. Sher report being marked confidential, add confidential stamp/designation to Dr. Sher report [.2]; finalize Initial Disclosures, prepare Certificate of Service and service letter and email to MEB for review [.8]; emails to/from B. Peterson regarding mailing and email documents for production to BITS to create flash drive [.2]; final review of letter, certificate of service and Initial Disclosures and email to B. Peterson for mailing, prepare email to opposing counsel serving Initial Disclosures and documents via email and forwarding flash drive password [.3]; email Sarff, et al. regarding re-production of Dr. Sher report with confidential designation [.2]; receive and review Defendants' Initial Disclosures/documents produced and download/save same [.4].	3.60	\$828.00
06/02/21	K. Bennett	Review materials disclosed from MPD on 6.1 [6.0] Draft memo to file/team of new materials [1.7] Draft email to team re: memo and analysis with re: to amended complaint [.4].	8.10	\$5,548.50
06/02/21	M. Betinsky	Review KHB memo re additional discovery materials received from City.	0.30	\$159.00
06/03/21	A. Noel	Review Katie Bennett memo re documents and communicate with team re: same	2.50	\$1,825.00
06/03/21	M. Betinsky	Emails re meet and confer for amended complaint (.2); review City's initial disclosures (.1).	0.30	\$159.00
06/04/21	R. Bennett	Review def. Rule 26 disclosures and Katie Bennett memo.	2.00	\$1,710.00
06/04/21	K. Bennett	Emails re: meet and confer [.2]Continue review of Defendants production and finalize memo [3.6]Review initial disclosures and emails re: same [.3].	4.10	\$2,808.50
06/04/21	M. Betinsky	Emails re initial disclosures and missing emails from same, emails re meet & confer with Sarff and Amended Complaint.	0.40	\$212.00
06/07/21	R. Bennett	Conference with CRT [.5]; review materials in 03 production [2.5].	3.00	\$2,565.00

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06/07/21	K. Bennett	Review memos and initial disclosures/discuss with RB [.3]Email Sarff re: emails mentioned in initial disclosures [.3]Texts re: meeting today [.1]Zoom re: meet and confer/plan and edits to amended complaint after review of additional production [.5]Review emails from Sarff and ATK re download Prod 03 [.3]Begin review of Prod 03 and draft memo re: same [6.0].	7.50	\$5,137.50
06/07/21	M. Betinsky	Zoom CRG re status and Sarff meet/confer.	0.50	\$265.00
06/07/21	A. Koob	Receive, review and download supplemental production from defendants and emails with KHB.	0.60	\$138.00
06/08/21	R. Bennett	Review Katie Bennett memos re docs in 6/7/21 production by defendants [1.0]; review MPD SWAT policies [.9]; review Katie Bennett memo, review of docs in 5/3/21 production from defendants [.7]; review of Katie Bennett's review of defendants' 6/1/21 production [.8]; prep for meet and confer [.9]; telephone conference with Katie Bennett re stip [.3]; review stip [.3]; telephone conference with Marc Betinsky re stip [.3].	5.20	\$4,446.00
06/08/21	K. Bennett	Cont review of Prod 03 and draft memo re same [4.0]Email Sarff re missing documents [.3]Email team re: SWAT materials and discovery ideas for Stevenson [.7]Prep for meet and confer/call with RB [.7]Call with counsel for Defendants re: First Amended Complaint [.4]Draft stipulation and circulate to team [.5].	6.60	\$4,521.00
06/08/21	M. Betinsky	Emails re Sarff call and proposed Amended Complaint and stip, review and edit stip and email KHB re same (.4); review memo re additional discovery items (.2); Call with RB re: stip (.3)	0.90	\$477.00
06/08/21	A. Koob	Telephone call from City Attorney's Office regarding documents produced with Plaintiff's Rule 26(a) Disclosures - needing additional information for access to the flash drive.	0.10	\$23.00
06/09/21	R. Bennett	Prepare for and attend conference call with CRT re action plan [1.0]; review stip and conference with CRT [.6].	1.60	\$1,368.00
06/09/21	A. Noel	Review stip and telephone conference with team re same.	0.70	\$511.00

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06/09/21	K. Bennett	Prepare for and attend zoom meeting with civil rights team re: action plan [1.3] Edit stipulation, send to Sarff, review her redline and discuss [1.2].	2.50	\$1,712.50
06/09/21	M. Betinsky	ZOOM with CRG re stip for amended complaint, discovery issues, and next steps in the case.	1.00	\$530.00
06/10/21	M. Betinsky	Emails re stip and amended complaint.	0.20	\$106.00
06/11/21	R. Bennett	Telephone conference with Katie Bennett re: stip [4] and review email re: same [2]	0.60	\$513.00
06/11/21	K. Bennett	Emails with defense counsel re: Stip. [4]; calls with RB re: same [4]	0.80	\$548.00
06/11/21	M. Betinsky	Review stip and emails re same for amended complaint.	0.20	\$106.00
06/14/21	R. Bennett	Telephone conference with Soren.	0.50	\$427.50
06/14/21	K. Bennett	Review CBS story on MPD payouts.	0.20	\$137.00
06/15/21	R. Bennett	Telephone coherence with Katie Bennett re: Amended Complaint	0.30	\$256.50
06/15/21	K. Bennett	telephone conference with RB re: complaint [3]	0.30	\$205.50
06/16/21	A. Noel	Review and analyze amended complaint.	2.20	\$1,606.00
06/16/21	K. Bennett	Review correspondence from Court/emails with team re: same [4]Redact amended complaint send to Sarff on 6/1; compare and finalize redline amended complaint for court [2.5]email to team/finalize and email directions to Molly [2].	3.10	\$2,123.50
06/16/21	M. Betinsky	Review email from Court regarding Amended Complaint, emails CRG and T/C with RB re same, review redactions and documents needed for submission to the court.	0.40	\$212.00
06/18/21	K. Bennett	Review emails and article/video re: Bender's response to recent news story with RB and strategize [3].	0.30	\$205.50
06/18/21	M. Betinsky	Review article re Lisa Bender and potential admissions by Minneapolis, emails re same and upload video re same.	0.20	\$106.00
06/24/21	R. Bennett	Review emails and details re admission of service by individual defendants [5]; TC with MEB re: stip to file Amended Complaint [2]	0.70	\$598.50

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06/24/21	M. Betinsky	T/C with RB re stip to file amended complaint and status/strategy.	0.20	\$106.00
06/25/21	R. Bennett	Review 8th Circuit opinion in Burbridge.	0.40	\$342.00
06/25/21	M. Betinsky	Email court re stip to amend complaint.	0.10	\$53.00
06/29/21	K. Bennett	Review email from court and provide attachments to Sarff [.2].	0.20	\$137.00
06/29/21	M. Betinsky	Email from Court, emails KHB and opposing counsel re stip to amend.	0.20	\$106.00
07/05/21	K. Bennett	Review emails re: stip and calls with MEB/RB re same.	0.50	\$342.50
07/07/21	A. Noel	Deal with stip issues.	1.30	\$949.00
07/07/21	M. Betinsky	Email from Sarff re misfiled stip, review prior emails to confirm same, call to Court regarding fixing misfiling.	0.40	No Charge
07/08/21	M. Betinsky	Draft and edit amended stipulation regarding amended complaint, conference call with RB/KHB re same and filing.	0.80	\$424.00
07/09/21	R. Bennett	Review filings and telephone conference with Marc Betinsky [.6]; telephone conference with client [.8].	1.40	\$1,197.00
07/09/21	M. Betinsky	Attention to filing amended complaint under seal and redacted amended complaint, call with court re unsigned filing, correct filing and re-file (.4), T/C with RB re same (.6); review Sarff changes to amended stip re amended complaint (.2).	1.20	\$636.00
07/12/21	M. Betinsky	Call with court re issuance of summonses, review same (.2), T/C with RB/KHB re same and service (.3), draft and send email to Sarff re service of summons and amended complaint (.1)	0.60	\$318.00
07/13/21	A. Koob	Review of updated M Health records and begin to work on summary of updated records.	1.90	\$437.00
07/15/21	M. Betinsky	Emails re Sarff's changes to replacement stip.	0.20	\$106.00
07/15/21	A. Koob	Complete review/summary of M Health updated records and add information to medical summary [1.1]; receive and review Hennepin Specialty Clinic records and work on summary of same [3.6].	4.70	\$1,081.00
07/19/21	M. Betinsky	Review MTF and records re latest medicals.	0.20	\$106.00

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07/19/21	A. Koob	Receive and review updated M Health billing records and compare to updated records received and update billing index, email to D. Roisum regarding missing billing, review billing index and previous M Health billing, miscellaneous file review and organization, finalize Hennepin Specialty Clinics summary, update medical summary with Hennepin Specialty Clinic appointments and email update to KHB, RB, MEB and AJN, emails to/from D. Roisum with additional information for missing M Health bills.	2.50	\$575.00
07/20/21	R. Bennett	Telephone conference with Marc Betinsky re July 27 letter to Judge TNL [.4]; two voice mails to K. Sarff at office and mobile [.3].	0.70	\$598.50
07/20/21	M. Betinsky	T/C with RB re required update letter to Court and interactions with Sarff and begin work on letter to Judge TNL.	1.40	\$742.00
07/21/21	R. Bennett	Telephone conference with Marc Betinsky re letter [.3]; telephone conference with K. Sarff re settlement issues [.4]; telephone conference with M. Betinsky re K. Sarff conversation [.3]; telephone conference with Andy Noel and Katie Bennett re settlement and Sarff conversation [.5]; review emails [.5]; telephone conference with client [.7].	2.70	\$2,308.50
07/21/21	A. Noel	telephone conference with RB/KHB re: settlement and Sarff conversation [.5]	0.50	\$365.00
07/21/21	K. Bennett	telephone conference with RB/AJN re: settlement and Sarff conversation [.5]	0.50	\$342.50
07/21/21	M. Betinsky	Continue drafting settlement letter to Judge TNL (2.9); T/Cs with RB re discussions with Sarff related to same and settlement (.6); emails/T/Cs with CRG re fees and costs to date and settlement strategy (.5).	4.00	\$2,120.00
07/22/21	R. Bennett	Review and propose my changes to letter to TNL.	1.00	\$855.00
07/22/21	M. Betinsky	Complete draft of letter to Judge TNL, review, revise and edit same, emails with RB re same and review & implement RB changes to same.	3.50	\$1,855.00
07/22/21	A. Koob	Review email from D. Roisum regarding missing M Health billing and submit updated request for same and update request index.	0.30	\$69.00
07/23/21	R. Bennett	Conference with Marc Betinsky re letter to TNL [.5]; review and final approval [.5].	1.00	\$855.00

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07/23/21	M. Betinsky	Finalize and submit letter to Judge TNL (.5) and T/C with RB re status and next steps (.5)	1.00	\$530.00
07/26/21	M. Betinsky	Work on second round of discovery requests.	0.50	\$265.00
07/27/21	R. Bennett	Telephone conference with Kristin Sarff [.7]; memo to file [.3].	1.00	\$855.00
07/29/21	M. Betinsky	Work on discovery requests.	0.30	\$159.00
07/30/21	R. Bennett	Review McCann answer [.7]; same with Severance answer [.8]; same with Bauer answer [.7]; cursory review City's answer [.5].	2.70	\$2,308.50
07/30/21	M. Betinsky	Brief review of Severance, McCann, and Bauer answers (.8); work on discovery requests (.3).	1.10	\$583.00
08/02/21	R. Bennett	Telephone conference with Marc Betinsky re analyze 4 answers.	0.50	\$427.50
08/02/21	A. Noel	Review and analyze answers.	1.20	\$876.00
08/02/21	M. Betinsky	Zoom RB re strategy and topics for written discovery and work on same.	0.50	\$265.00
08/04/21	R. Bennett	Review order for settlement conference [.6]; correspondence to client [.5]; draft and revise correspondence to Sarff and telephone conference with Marc Betinsky [1.0].	2.10	\$1,795.50
08/04/21	M. Betinsky	T/C with RB re strategy (1.0) and email to Sarff re settlement, review and modify same (.4); email to client (.1).	1.50	\$795.00
08/05/21	A. Koob	Review email from RB to client with Order for Settlement Conference.	0.10	\$23.00
08/09/21	R. Bennett	Review file.	0.30	\$256.50
08/09/21	K. Bennett	Review and compare Bauer Answer and Amended Complaint [2.0]Review updated medical summaries [.7].	2.70	\$1,849.50
08/11/21	K. Bennett	Strategize re: discovery requests and discuss with MEB re: production [.5]	0.50	\$342.50
08/11/21	M. Betinsky	Work on drafts of Interrogatories and document requests to all defendants, review document received in discovery thus far for same (1.7), T/Cs and emails with KHB re index of defense documents for same (.3);	2.00	\$1,060.00

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08/12/21	R. Bennett	Telephone conference with Marc Betinsky re discovery [.4]; email Sarff [.4]; review Marc Betinsky draft discovery requests [1.0].	1.80	\$1,539.00
08/12/21	M. Betinsky	Complete drafts of interrogatories to Bauer, City, Severance and McCann and RFPDs to City and Bauer and edit same (3.5); T/C with RB re depositions and strategy for settlement conference (.4).	3.90	\$2,067.00
08/13/21	M. Betinsky	Make necessary edits to discovery requests, oversee prep of cover letter, oversee service of discovery requests to Bauer, McCann, Severance and City.	1.40	\$742.00
08/16/21	M. Betinsky	Work on comparisons of Complaint to various answers filed by defendants.	0.60	\$318.00
08/17/21	M. Betinsky	Continue work on comparisons of answers to Amended Complaint.	0.70	\$371.00
08/18/21	R. Bennett	Telephone conference with client and K Bennett	0.60	\$513.00
08/18/21	K. Bennett	Discussions re: next steps and call with Soren/RB.	0.40	\$274.00
08/18/21	M. Betinsky	Continue working on comparison of answers to Amended Complaint.	0.70	\$371.00
08/19/21	M. Betinsky	Work on comparisons of answers to Amended Complaint (1.5); email Jack Ryan (.2).	1.70	\$901.00
08/20/21	M. Betinsky	Work on comparisons between answers and Amended Complaint (1.0); emails re deposition scheduling (.3).	1.30	\$689.00
08/23/21	R. Bennett	Review and revise depo notice and room scheduling [.6]; telephone conference with Andy Noel re potential methodology for ID inquiry [.6]; review Bauer personnel file [1.5].	2.70	\$2,308.50
08/23/21	A. Noel	telephone conference with RB re: potential methodology for ID inquiry [.6]	0.60	\$438.00
08/23/21	M. Betinsky	Emails re depositions and logistics for same.	0.20	\$106.00
08/30/21	R. Bennett	Work on settlement strategy.	1.00	\$855.00
08/30/21	E. Mignanelli	Review and analyze pleadings for the case and ethical wall memorandum.	0.70	\$406.00
08/31/21	A. Noel	Telephone conference with Tim Phillips re MPD depositions he has completed in state court matter and draft memo re: same	1.00	\$730.00

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08/31/21	M. Betinsky	Deposition prep and document review for same	0.70	\$371.00
09/01/21	R. Bennett	Conference with CRT re action plan - discovery and depos.	1.00	\$855.00
09/01/21	A. Noel	Telephone conference with team re discovery and depo strategy.	1.00	\$730.00
09/01/21	K. Bennett	Meeting with Civil Rights team re: work allocation and plan heading into depositions.	1.00	\$685.00
09/01/21	E. Mignanelli	Conference with team re planning for depositions and analysis of discovery in preparation for same.	1.00	\$580.00
09/01/21	M. Betinsky	CRG planning meeting about next steps and strategy for Bauer, McCann, Severance depositions (1.0); begin review of documents for same (1.0); draft list of bullet points for Sarff re discovery documents from Marks and use in Bauer deposition (.4).	2.40	\$1,272.00
09/02/21	M. Betinsky	Continue review of city document production for deposition prep.	2.00	\$1,060.00
09/03/21	M. Betinsky	Continue review of defense document production for deposition prep.	2.00	\$1,060.00
09/07/21	R. Bennett	Conference with Marc Betinsky re use of force time trap [.3]; telephone conference with Ronn Kreps [.4].	0.70	\$598.50
09/08/21	E. Mignanelli	Begin review and organization of discovery produced by defendants in preparation for depositions.	0.70	\$406.00
09/08/21	M. Betinsky	Continue legal research on less-lethal uses and facts surrounding uses of force for deposition prep	4.00	\$2,120.00
09/09/21	R. Bennett	Review email from Sarff and telephone conference with Marc Betinsky [.5]; review and revise March Betinsky's draft and conference with Marc Betinsky and Andy Noel [1.0].	1.50	\$1,282.50
09/09/21	A. Noel	Meeting with team re video and ID issues.	0.70	\$511.00
09/09/21	M. Betinsky	Email from Sarff re extension request, T/C with RB re strategy for response and additional information re same (.5), draft and revise email to Sarff re same (.5); continued research on case law re less-lethals and crowd/riot situations (1.0); conf with RB/AJN re: video/ID (.7)	2.70	\$1,431.00

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09/10/21	R. Bennett	Telephone conference with client [.5]; conference with Marc Betinsky on case issues for deposition questions and review related cases (2nd circuit) [1.5].	2.00	\$1,710.00
09/10/21	M. Betinsky	Continued research on defense purported justifications for use of force and crowd-control/riot case law (3.0); T/C with RB re discovery extension request and lack of response, strategy moving forward (.3); work on review of documents from city for depositions (1.7).	5.00	\$2,650.00
09/13/21	K. Bennett	call with MEB re: depo prep/strategy/assignments [.5]	0.50	\$342.50
09/13/21	M. Betinsky	Latest email from Sarff re discovery responses, messages with CRG re same, draft and circulate response to same (.6); T/C with KHB re deposition prep, strategy and next steps (.5); review defendants' discovery re deposition prep (2.4).	3.50	\$1,855.00
09/14/21	K. Bennett	Begin deposition prep/file review [.6]Review original complaint and answer comparison [1.0]Review amended complaint filed under seal and comparison to answer; begin drafting memo re: key issues from Bauer's answer [2.4].	4.00	\$2,740.00
09/14/21	M. Betinsky	Complete comparison of Bauer answer to amended complaint and email KHB re same and thoughts about admissions for use at impending depositions.	3.00	\$1,590.00
09/14/21	A. Koob	Receive and review missing billing record from M Health, compare to records received previously and review of records requested to date, submit request for billing records from U of M Physicians [.5]; receive and review CNR from HCMC regarding bills for 1.27.21 visit with Dr. Watercott, review of previous records received and confirm visit date in records, email to K. Lyons and D. Roisum regarding same [.4]; emails with K. Lyons regarding Dr. Watercott and online search regarding same [.2]; submit request for records from Bright Eyes Vision Clinic and update notes/indexes regarding same [.2].	1.30	\$299.00
09/15/21	K. Bennett	Continue review of Defendants' discovery to index and create list of hot documents/depo prep.	4.00	\$2,740.00
09/15/21	M. Betinsky	Emails about defendants' document production, missing documents and correspondence with Sarff.	0.60	\$318.00

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09/16/21	R. Bennett	Review Katie Bennett memo [.5]; review Sarff email [.3]; conference with Angela Koob and Katie Bennett re defendants' ATI and RRPD [.4]; review same [1.0].	2.40	\$2,052.00
09/16/21	K. Bennett	Continue review of defendant's discovery and depo prep for defendants' upcoming depositions.	4.40	\$3,014.00
09/16/21	K. Bennett	Review discovery responses [2.6]Begin drafting letter to Sarff re: same [1.4].	4.00	\$2,740.00
09/16/21	M. Betinsky	Review defendants' discovery responses(.4), conference calls with RB/KHB re deficiencies in same and next steps(.7), email KHB thoughts for Sarff letter and legal research regarding City's discovery deficiencies, follow-up messages re same (1.0)	2.10	\$1,113.00
09/16/21	A. Koob	Review email from KHB regarding upcoming depositions/prep and respond to same.	0.10	\$23.00
09/17/21	R. Bennett	Review and approve letter to Sarff re discovery issue.	1.00	\$855.00
09/17/21	A. Noel	conference with RB/MEB re: KHB ltr [.3]	0.30	\$219.00
09/17/21	K. Bennett	Continue review and analysis of Sept 13 discovery and update letter to Sarff [2.2]Review emails with citations from MEB; calls with MEB re: edits and strategy [.7]Edit letter and send to AJN/MEB for comment [.9]Call with MEB/AJN and edit letter [.3]Further edit letter/demand portion and email draft to RB for review [.3]Continue depo prep/file review/organization of unlabeled documents from defendants [1.5].	5.90	\$4,041.50
09/17/21	M. Betinsky	Review and revise letter (1.8), follow-up T/C with KHB re: same (.4), review revised letter and make further edits (.7), follow-up call and emails with KHB/AJN re same (.3)	3.20	\$1,696.00
09/20/21	R. Bennett	Review file/prep to move quickly on Sarff and City.	1.40	\$1,197.00
09/20/21	K. Bennett	Continue review of initial disclosures [2.2]Draft and send list for printing/depo prep to ATK [1.0]	3.20	\$2,192.00
09/20/21	M. Betinsky	Work on comparison of McCann answer to amended complaint (2.5); work on document review for impending depositions (2.0).	4.50	\$2,385.00

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09/20/21	A. Koob	Email to KHB regarding deposition preparation [.1]; work on organizing and preparing binders for deposition preparation/potential exhibits and printing off copies for binders for RB and KHB [4.5]; email to KHB regarding documents and telephone call with KHB regarding same [.1].	4.70	\$1,081.00
09/21/21	R. Bennett	Telephone conference with Marc Betinsky and Katie Bennett re action plan variables [1.2]; watch MPD videos with Katie Bennett for deposition [4.0].	5.20	\$4,446.00
09/21/21	K. Bennett	Review video memos and flag key portions; compare to audio files [2.2]Begin review of McCann BWC video [.6]Call with RB and MEB re: deposition plan [1.2]Call with RB re: video [2.2]Review video with RB/strategize re: McCann, Severance and Bauer depositions [4.0]	8.20	\$5,617.00
09/21/21	M. Betinsky	Strategy meeting (call) with RB/KHB re impending depositions, missing documents, settlement conference and potential motion to compel (1.2); review documents for deposition (1.5); work on comparison of Severance answer to Amended Complaint (3.0); further research re less-lethal use in crowd situations (1.5).	7.20	\$3,816.00
09/21/21	A. Koob	Continue to work on preparing deposition prep binders/potential exhibits, finalize binders, review same and email to KHB.	3.80	\$874.00
09/22/21	R. Bennett	Conference with Katie Bennett [.5]; telephone conference with Marc Betinsky re to-do list - motion [.7]; review hot docs [1.0]; review Katie Bennett email re proof trail [.4]; review Sarff letter and text - late [.4].	3.00	\$2,565.00
09/22/21	K. Bennett	Continue review of SWAT 1280 body worn camera (and others) to confirm weapon of each individual; draft memo/email re same and depo outline.	8.90	\$6,096.50

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09/22/21	M. Betinsky	T/C RB re next steps and deposition strategy (.4); T/C KHB re bodycam video review (.3); review materials from KHB re documents received from City, review bodycam videos re same, review outlines of deposition questions, strategize for depositions (3.0); review correspondence from City re documents and depositions, messages with CRG re same and strategy for next steps (.5); complete comparison of Severance answer to amended complaint and email KHB re thoughts for admissions useful in deposition (.8).	5.00	\$2,650.00
09/23/21	R. Bennett	Telephone conferences with Marc Betinsky re recent productions x4 [1.0]; conference with Katie Bennett re hot docs [.6].	1.60	\$1,368.00
09/23/21	K. Bennett	Continue prepping for depositions and drafting witness outlines. [2.9] conference with RB re: hot docs/depos [.6]	3.50	\$2,397.50
09/23/21	M. Betinsky	Review all newly produced documents from defendants and index same, emails with RB/KHB re same and deposition strategy factoring in new documents, prepare list of missing documents and email opposing counsel same.	9.80	\$5,194.00
09/23/21	A. Koob	Review emails regarding production and download/save same and print off documents for KHB review [2.5]; create binders for KHB of additional documents for review, additional documents produced and telephone call to KHB regarding same and extract additional documents [.4]; telephone call with MEB regarding production and potential missing items [.3]; review documents produced for missing documents and email to MEB [.3].	3.50	\$805.00
09/24/21	R. Bennett	Review hot docs to prep for depo/potential exhibits for use at depositions	2.50	\$2,137.50
09/24/21	K. Bennett	Deposition prep/review training documents recently produced in native form [2.0] Strategize with RB re: upcoming depositions [1.0] Update from MEB with RB/KHB re: recent production and plan for depositions [.5]	3.50	\$2,397.50

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09/24/21	M. Betinsky	Review additional documents/video from City, T/Cs with RB/KHB re same and deposition strategy (4.5); work on exhibits for depositions and emails/T/Cs with Paul McCaffrey re preparation of same, emails RB/KHB re same (.8).	5.30	\$2,809.00
09/24/21	A. Koob	Review emails regarding missing .wav files and download same [.3]; begin review/compare of Bauer employment records produced in Stevenson vs. Bauer employment records produced in Marks [.9]	1.20	\$276.00
09/26/21	R. Bennett	Review BWC video and compare to report [3.0]; review requests [1.2].	4.20	\$3,591.00
09/26/21	K. Bennett	Review BWC with RB and strategize re: depositions [3.0]Continue review of Key Docs from Initial Disclosures/prep for depositions [1.2].	4.20	\$2,877.00
09/27/21	R. Bennett	Conference call with Marc Betinsky and Katie Bennett [1.4]; telephone conferences with Marc Betinsky x5 [1.6]; review reports and video [2.0]; telephone conference with Jane Doby x2 [.6].	5.60	\$4,788.00
09/27/21	A. Noel	Review Katie Bennett emails, photos, memos for strategizing/depo advice	1.90	\$1,387.00
09/27/21	K. Bennett	Review key BWC and begin drafting additional outlines for depositions [6.2]Calls/Zooms with Paul [.5]Calls with RB and MEB re: video evidence, strategy [1.4]Review letter to Sarff and discuss with team [1.2]Begin review of Key Docs from Stevenson Prod 1 and prep for depositions [.8]Review texts re: Sarff's production [.2].	10.30	\$7,055.50
09/27/21	M. Betinsky	Numerous conferences with RB/KHB re deposition issues, review outline of identification questions for depositions, strategize re in-person vs remote depositions, conferences with RB/P. McCaffrey re in-person depositions, technology and attempts to stream video over Zoom, test same with various videos and different locations, draft and edit letter to Sarff re depositions, attention to exhibits to same and oversee sending same, review amended depo notice and revise same, further work on deposition prep and strategy, emails and coordinate with court reporter and videographer for depositions (9.5); brief review of additional documents received from city (.3).	9.80	\$5,194.00
09/27/21	P. McCaffrey	Assistance with depo prep.	2.00	\$590.00

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09/27/21	P. McCaffrey	Assistance with depo prep.	0.70	\$206.50
09/28/21	R. Bennett	Telephone conference with client [.3]; attend meeting re depo prep with Marc Betinsky and Katie Bennett [3.0]; telephone conference with Kristin Sarff x2 [.8]; telephone conference with Marc Betinsky [.4]; review revised outline [.5]; call with A. Koob re: exhibits [.2]	5.20	\$4,446.00
09/28/21	K. Bennett	Review key BWC and draft outline for timing around shooting and email to team [1.7]Continue review of Key Docs from Stevenson Production 1/prep for depositions [2.0]Review key BWC and analyze with RB/MEB [4.0]Continue review of documents, complaint/radio traffic and depo prep/drafting outlines for upcoming depositions [3.2]Calls with RB/MEB re: Sarff conversations [.4]Call with MEB re: supervisory claim [.3].	11.60	\$7,946.00
09/28/21	M. Betinsky	Prep session with RB/KHB for depositions, review bodycam video, work on outlines, etc, coordinate with technology team re depositions and audio/video for same (4.5); review newly produced documents from City & emails RB/KHB re same (5.5); conference calls with RB/KHB re deposition schedule and changes, strategy for depositions before 11/2 settlement conference and call with Sarff re same (.5); conference call RB/KHB re supervisory liability claim and potential amendment, review scheduling order re same and strategize re amendment (.5).	11.00	\$5,830.00
09/28/21	A. Koob	Receive and begin to download/brief review of recent document production [.6]; telephone call with RB regarding documents for deposition prep and print/prepare binders with same for RB, KHB and MEB [1.1]; continue to work on comparing Bauer employment documents produced in Stevenson vs. Marks productions [1.8]; save additional document prep materials in depo prep folder on T Drive [.4].	3.90	\$897.00
09/28/21	P. McCaffrey	Continued - Assistance with video work.	0.70	\$206.50
09/29/21	R. Bennett	Review 2nd amended complaint reline, emails and stip and telephone conference with Marc Betinsky re same x2 [1.0]; emails to Sieff [.4]; review of 9/22/2021 Doe production [2.8]; telephone conference with Marc Betinsky re transcript of Bauer 40 MMM usage/OPCR21-01629 [1.5].	5.70	\$4,873.50

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09/29/21	A. Noel	Review and offer comments on the amended complaint.	1.00	\$730.00
09/29/21	K. Bennett	Continue drafting McCann Depo outline [1.2]Draft exhibits for van and line up [.6]Strategize with regard to video use to establish locations at McCann's deposition [.8]Review MEB finds re: Bauer (IA, interviews) [1.8].	4.40	\$3,014.00
09/29/21	M. Betinsky	Numerous conferences with RB/KHB re depositions, planning and strategy, emails re same, T/Cs with Jane Doby/Jayne Hogan re same (1.2); continue review of newly produced documents from defendants (5.0); review amended complaint and prepare redlined second amended complaint, email same to CRG and Sarff (.8).	7.00	\$3,710.00
09/29/21	A. Koob	Continue to work on downloading production, including telephone call with BITS regarding same, emails to/from MEB.	1.20	\$276.00
09/30/21	R. Bennett	Re-notice depo and telephone conference with Marc Betinsky re discovery [.7]; review Katie Bennett depo outline: Swat 1280 van layout and weapon assignments 5/31/20; lineup at go time exh.; Swat 1280 van weapon layout 5/31/20; review Sarff response and stip [1.8].	2.50	\$2,137.50
09/30/21	K. Bennett	Review of hot documents from 6.7 production [1.2]Strategize re: depositions and supervisory liability [1.5].	2.70	\$1,849.50
09/30/21	M. Betinsky	Complete review and indexing of latest city document production (6.0); draft stipulation re amended complaint, emails with Sarff re same, draft proposed order re same (.7); emails/calls with RB/KHB re deposition strategy and planning, emails re revised deposition notice, emails re deposition logistics (1.3).	8.00	\$4,240.00
09/30/21	A. Koob	Email to MEB regarding missing Bauer materials (from Marks production) and additional review of same for other missing pages.	0.30	\$69.00
10/01/21	R. Bennett	Attend zoom meeting with Marc Betinsky and Katie Bennett re: Second Amended Complaint [1.0]; telephone conference with Marc Betinsky re filing of 2nd amended complaint [.5]; further document and exhibit review [3.0].	4.50	\$3,847.50

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10/01/21	K. Bennett	Continue review of 6.7 production hot documents [2.4]Zoom meeting re: depo prep and strategy/recent document production with MEB and RB [1.1]Begin in-depth review of McCann BWC re: supervisory claims [3.7]Continue drafting/editing McCann depo outline re: command staff/supervisory claims [2.5].	9.70	\$6,644.50
10/01/21	M. Betinsky	Calls with RB re depositions and strategy (.5), ZOOM with RB/KHB re bodycam videos and use in depositions (1.1), deposition logistics, use of documents, etc, continued review and analysis of documents for deposition of McCann on 10/18 (2.4); attention to finalizing redlines of amended complaint, stip for amended complaint, proposed order and filing same (1.0).	5.00	\$2,650.00
10/01/21	A. Koob	Telephone call with MJO and emails regarding redaction of Amended Complaints for filing, receive and review documents, redact information from Amended Complaints, emails to/from MEB regarding Amended Complaints, update to Amended Complaints, finalize and email Amended Complaints to MEB and MJO.	0.80	\$184.00
10/04/21	R. Bennett	Conference with Katie Bennett [.3]; telephone conference with client [1.2]; telephone conference with Andy Noel re call [.4]; telephone conference with Katie Bennett re call and action plan [.5]; analyze RK billing data [.6].	3.00	\$2,565.00
10/04/21	A. Noel	conference with RB re: call with client [.4]	0.40	\$292.00
10/04/21	K. Bennett	Continue review of McCann's BWC video re: supervisory claims/draft outline re: same [6.8]Send Part I McCann outline to team [.2]Emails with Molly and Paul to set up rooms/practice runs for this week [.2]; Conference with RB re: action plan [.8]	8.00	\$5,480.00
10/04/21	M. Betinsky	Emails with KHB, review outline of phase 1 of McCann questions.	0.30	\$159.00
10/05/21	R. Bennett	Telephone conference with Marc Betinsky re launcher/ordinance characteristics, etc. [.5]; review his further response [.5]; telephone conference with Marc Betinsky/Katie Bennett re mode of deposition attack - usages of these outlines [.9]; review document production 5 - all outlines [4.2].	6.10	\$5,215.50

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10/05/21	K. Bennett	Review McCann's BWC for use of force/shots and draft outline re: same and send to team [4.6]Conf call with MEB/RB re: depo prep/delegation of duties and plan at depo re: BWC [8]Emails with Jayme Hogan re: video depo [2]Review MEB's emails re: launcher and site; call re: same and respond with Jensen video times to watch [5]Continue drafting use of force/elimination of others outline and review BWC [1.7]Review emails from MEB re: possible other videos capturing 40 mm launchers firing and reply [3]Review articles on MPD excessive force post GF murder [5].	8.60	\$5,891.00
10/05/21	M. Betinsky	Research re LMT launcher and 40mm rounds used, emails RB/KHB re same (.8), T/C with RB re deposition strategy, conference call with RB/KHB re same (.9), review outlines of identification questions and substantive info for McCann depo, review documents for same, review video for same, strategize for deposition (5)	6.70	\$3,551.00
10/06/21	R. Bennett	Dept prep for Ryan McCann with Marc Betinsky and Katie Bennett [4.0]; conference with Jayme Hogan - McCaffrey/Ricardo/Travis [1.0].	5.00	\$4,275.00
10/06/21	K. Bennett	Prep for civil rights team meeting/depo prep.	8.20	\$5,617.00
10/06/21	E. Mignanelli	Develop strategy and preparation for McCann deposition.	0.90	\$522.00
10/06/21	M. Betinsky	Meeting with RB/KHB for video review for use in depositions, strategy and planning for depositions, outline preparation and document review for same, work on compiling list of hot docs and collating same for use in depos, team meeting with multimedia group re camera set up and screens for bodycam viewing.	7.50	\$3,975.00
10/06/21	P. McCaffrey	Assistance with depo setup.	0.70	\$206.50
10/06/21	R. Ehamjian	Depo and tech run through in the Conference Center.	0.70	\$196.00
10/06/21	T. Wilhelmi	Depo prep, room and tech setup/ run through in the Conference Center.	0.70	\$196.00
10/07/21	R. Bennett	Conference with Katie Bennett [5]; telephone conference with client [4]; depo prep [2.1].	3.00	\$2,565.00

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10/07/21	K. Bennett	Cont review of 6.7 production and drafting questions re: materials/hot docs/McCann depo prep questions [4.2] conf with RB re same [.5]	4.70	\$3,219.50
10/07/21	M. Betinsky	Continue preparing list of hot docs for McCann deposition, bodycam and document review for same, deposition, strategy, and logistics (6.0); email Sarff re missing McCann docs from prior IA/deadly force case (.3);	6.30	\$3,339.00
10/08/21	R. Bennett	Review document production in prep for deposition and settlement conference.	2.80	\$2,394.00
10/08/21	K. Bennett	Finalize review of 6.7 production and drafting questions re: materials/hot docs/McCann depo prep questions.	6.80	\$4,658.00
10/08/21	M. Betinsky	Complete review and indexing of hot docs for McCann deposition, emails RB/KHB re same (4.4); attention to logistics for deposition and emails multimedia team/KHB re same (.4).	4.80	\$2,544.00
10/11/21	R. Bennett	Telephone conference with Marc and further review of docs in prep for depo [2.0]; telephone conference with Katie Bennett re depo plan [.3]; review Severance and McCann statements [1.0]; telephone conference with Marc re letter to TNL [.5]; review next draft of letter [.6].	4.40	\$3,762.00
10/11/21	K. Bennett	Review notes on 6.7.20 review of hot docs and create outline for McCann; send to team [1.6].	1.60	\$1,096.00
10/11/21	K. Bennett	call with RB re depo plan/strategy [.3]	0.30	\$205.50
10/11/21	M. Betinsky	Draft, revise, and edit status update letter to Judge TNL (5.5); T/C with RB re strategy and exhibits for McCann deposition (.5), work on exhibits, work on deposition prep (1.8).	7.80	\$4,134.00
10/12/21	R. Bennett	Review and approve letter to TNL [.4]; telephone conference with Katie Bennett and Marc Betinsky re docs, exhibits and depositions [2.0]; review doc production [1.2]; review exhibit list [.5]; updated outline [.5]; telephone conference with Katie Bennett [.3].	4.90	\$4,189.50
10/12/21	A. Noel	Review status letter to TNL.	1.30	\$949.00

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10/12/21	K. Bennett	Zoom conf with MEB/RB re: depo strategy and questions/exhibit discussion and discussion of next steps and staffing needs heading into Monday's deposition [2.0]Create exhibit list and circulate/email ATK re: plan [1.7]Review 3A and 04 production [1.0]Continue review of recent 9.22.21 production and strategize re: upcoming depositions [3.6]Draft outline for McCann with citations to 9.22.21 production and circulate [1.4]; conf with RB re: same [.3]	10.00	\$6,850.00
10/12/21	M. Betinsky	Zoom with RB/KHB re McCann deposition exhibits, strategy and logistics (2.0); email Sarff re COVID issues and attestation (.2); legal research on deadly force with less-lethal weapons (2.0); finalize update letter to Judge TNL and attachment and send same (.5); emails re exhibits for depositions (.4); work on deposition outline review to add questions/topics for McCann deposition (1.5).	6.60	\$3,498.00
10/12/21	A. Koob	Receive and review HCMC records and review of most-recent records requested and medical summary, email to KHB/RB regarding requesting updated records [.4]; request/submit updated records requests for HCMC, M Health and Brave Choices, update index, file organization and review [.8]; telephone call with RB regarding McCann deposition exhibits [.1]; multiple emails from KHB regarding McCann deposition exhibits and emails from MEB regarding same [.3]; work on saving/organizing deposition exhibits for printing in advance of McCann deposition, emails to KHB and MEB regarding same [2.2].	3.80	\$874.00
10/13/21	R. Bennett	Review exhibits and outline and depo prep.	3.80	\$3,249.00
10/13/21	K. Bennett	Review and edit McCann depo outline part I, SWAT van identification outline and SWAT weapon outline [4.6]Create Van Packet Exhibit and Weapon Packet Exhibit [1.8]Review MEB edits to McCann Depo outline part I and add in citations to McCann BWC video/finalize [1.6].	8.00	\$5,480.00
10/13/21	M. Betinsky	Review and edit outlines of McCann deposition, emails RB/KHB re same, numerous emails with RB/KHB re strategy for McCann deposition and logistics.	8.00	\$4,240.00

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Date	Timekeeper	Description	Hours	Fees
10/13/21	A. Koob	Prepare email with instructions/depo exhibits to be printed in advance of McCann deposition and send to Office Services.	0.20	\$46.00
10/14/21	R. Bennett	Prep for depositions - review and circulate outlines - exhibits; calls/strategy re: same	4.20	\$3,591.00
10/14/21	K. Bennett	Review MEB edits and finalize KHB edits to McCann depo outline part I [4.2]Review MEB edits and finalize KHB edits to McCann depo outline part II [3.4]Review BWC to send clips needed re: graham factors to Paul and email [1.1]Review Layout at shooting exhibit, edit and circulate [.8]Discussions with MEB re: Jensen and Kelly depositions; review emails re: 10.14 production [.3]Email ATK re: additional exhibits [.3]Discussions with RB and MEB re: prep meeting tomorrow [.4].	10.50	\$7,192.50
10/14/21	M. Betinsky	Emails Sarff re latest batch of City documents and begin review and indexing of new documents from City (2.6); numerous emails/calls with RB/KHB re deposition planning, logistics, and strategy, work on additions/edits to deposition outlines for McCann (1.0); attention to filing second amended complaint under seal and redacted second amended complaint and T/C with A. Koob re same (.5); review Seely and Kelly prior deposition testimony, T/Cs and emails with RB/KHB re same and use at McCann (or other) depositions, prepare bullet points of key testimony and admissions (4.0); emails re Exhibits for McCann deposition, shortened bodycam clip and review same (.5); email Sarff re attendees at McCann depo (.1).	8.70	\$4,611.00

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10/14/21	A. Koob	Telephone call with MEB regarding filing of Second Amended Complaint under seal and redacted version of Second Amended Complaint, revisions to same and finalize [.8]; file Second Amended Complaint under seal and redacted versions [.6]; work on review of McCann deposition exhibits, various emails with KHB and MEB, including additional deposition exhibits for printing, additional information, including BWC and audio for flash drives, create flash drives with BWC and audio for McCann deposition, organize and print additional exhibits for McCann deposition, review of exhibits printed by Office Services, review of all exhibits for McCann deposition, prepare index of exhibits for KHB info, deliver exhibits to KHB [8].	9.40	\$2,162.00
10/14/21	P. McCaffrey	Assistance with depo setup.	2.00	\$590.00
10/15/21	R. Bennett	Depo prep with Katie Bennett, Andy Noel and Marc Betinsky with outlines and exhibits.	6.00	\$5,130.00
10/15/21	A. Noel	Team meeting re depo prep.	2.00	\$1,460.00
10/15/21	K. Bennett	Prep for McCann deposition - exhibits and finalize outlines [2.3]Prep with RB and MEB re: video/outline and strategy [7.3].	9.60	\$6,576.00
10/15/21	M. Betinsky	Continue review and indexing newly received documents from City (3.5); meet with RB/KHB re McCann deposition, strategize for same, review and test bodycam videos, work on exhibits for deposition and prepare exhibit list, revisions to outlines for deposition (6.0).	9.50	\$5,035.00
10/15/21	A. Koob	Email to KHB and MEB regarding McCann deposition exhibits.	0.10	\$23.00
10/15/21	P. McCaffrey	Assistance with depo setup.	1.00	\$295.00
10/16/21	K. Bennett	Edit outlines and finalize; send to team.	3.50	\$2,397.50
10/17/21	E. Mignanelli	Prepare for deposition of R. McCann by reviewing and analyzing outlines and exhibits referenced in same.	1.20	\$696.00
10/17/21	M. Betinsky	Review finalized outlines for McCann and email RB/KHB re same, review finalized index list.	4.00	\$2,120.00

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10/18/21	R. Bennett	Prep for and attend deposition of Ryan McCann, including meeting with clients and CRT during and after deposition.	12.00	\$10,260.00
10/18/21	K. Bennett	Prep for McCann depo (finalize exhibits, outlines, lists and gather all items required for depo) [2.5]Attend deposition of McCann [9.1].	11.60	\$7,946.00
10/18/21	G. Wiessner	Researched law on deadly force and wrote memorandum summarizing the findings.	8.00	\$3,880.00
10/18/21	E. Mignanelli	Attend deposition of R. McCann.	10.60	No Charge
10/18/21	M. Betinsky	Final prep for and attend McCann deposition; debrief afterwards.	12.00	\$6,360.00
10/18/21	A. Koob	Emails with MEB regarding McCann deposition and client.	0.10	\$23.00
10/19/21	R. Bennett	Post depo conference with Katie Bennett and Marc Betinsky [.4]; conference with Katie Bennett and Marc Betinsky re letter to TNL [.3].	0.70	\$598.50
10/19/21	K. Bennett	Call with RB/MEB re: letter to TNL[.3]; post depo conference with RB/MEB [.4]	0.70	\$479.50
10/19/21	M. Betinsky	Continue review and indexing of latest batch of documents from City.	3.20	\$1,696.00
10/19/21	M. Betinsky	Calls with RB and KHB re: letter to TNL[.3]; post depo conference with team [.4]	0.70	\$371.00
10/20/21	R. Bennett	Go over TNL letter outline in detail with Katie Bennett [.8]; discuss BWC differences and event anchor with Katie Bennett and Marc Betinsky [.8].	1.60	\$1,368.00
10/20/21	K. Bennett	Review updated medical [1.4]Review status letter [.4]Review mediation submissions [.9]Review order for settlement conference [.2]Begin drafting confidential settlement submission [4.8]Review BWC for time differences [2.4]Discussion w MEB/RB re: BWC time differences and plan for settlement conference [.3]Review article re: recent settlement [.2].	10.60	\$7,261.00
10/20/21	M. Betinsky	Continue review and indexing latest batch of documents from City (2.2); conference call with RB/KHB re strategy, bodycam sync issues, and pre-settlement conference submissions (.6).	2.80	\$1,484.00

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10/21/21	R. Bennett	Review of BWC events/time comparison [.6]; review email and discuss with team [.8]; site visit with B. Cade and Katie Bennett [1.5]; conference with Katie Bennett [.4].	3.30	\$2,821.50
10/21/21	A. Noel	Review in detail Katie Bennett memo re further shooter ID and associated BWC.	1.70	\$1,241.00
10/21/21	K. Bennett	Additional scene visit with RB/Cade [1.5]; conference with RB re same [.4]	1.90	\$1,301.50
10/21/21	K. Bennett	BWC review for time analysis [5.3]Draft memo re: same [1.9]Circulate memo to team [.2]Begin drafting letter to Mag. TNL [2.6]; conference with RB re: BWC time analysis [.4]	10.40	\$7,124.00
10/21/21	E. Mignanelli	Review of pertinent BWC footage from McCann's deposition testimony in preparation for continued discovery and anticipated conferences.	0.50	\$290.00
10/21/21	M. Betinsky	Continue review and indexing of latest batch of documents from City (6.0); comparison of differences between time stamps, strategize re use of same for settlement-conference submission, review KHB memo re same, emails re same (1.5).	7.50	\$3,975.00
10/21/21	A. Koob	Review of subrogation information received to date, telephone call to Hennepin Health requesting updated subrogation information and email to Hennepin Health regarding same, telephone call (left voice mail) and email to MN DHS regarding updated subrogation information [.5]; receive and review HCMC billing records, review of previous bills received and update billing index [.5]; receive and review updated itemization from Hennepin Health and compare to bills received to date, submit requests for records from Midwest Eye Laboratories, Anesthesia and M Health as found in Hennepin Health itemization, updates to request index and billing index and email to K. Lyons regarding request for bills from M Health [2.3]; telephone call to M Health billing to check status of outstanding 5.31.20 bills, 10.07.20 surgery and 1.20.21 canceled surgery charge [.2]; summary/update to KHB and RB regarding subrogation information/billing to date [.2].	3.70	\$851.00
10/21/21	B. Cade	Case investigation; scene inspection; photos; measurements.	4.00	\$880.00

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10/22/21	R. Bennett	Telephone conference with Marc Betinsky re letter thoughts and demand [.5]; telephone conference with Andy Noel re his settlement email and letter strategy [.4]; telephone conference with Katie Bennett re same plus thoughts on recent draft letter to TNL and review same [.7]; review and comment on letter [.7]; telephone conference with Esther re her take on Sarff and demand thoughts [.4]; work on final draft of demand letter [.5]; telephone conference with Soren Stevenson [.7]; email to Sarff [.4].	4.30	\$3,676.50
10/22/21	A. Noel	Telephone conference with RB [.4] and review memos re video issues/needs [.7]	1.10	\$803.00
10/22/21	K. Bennett	Finalize draft letter to TNL and send to RB for review [5.4]; telephone conference with RB re: letter [.3]	5.70	\$3,904.50
10/22/21	G. Wiessner	Followed up with additional research on deadly force issues related to less-lethal weapons.	1.80	\$873.00
10/22/21	M. Betinsky	Continue reviewing and indexing latest document dump from City (3.3); multiple T/Cs with RB re demand letter to Sarff (.5), review and edit same, emails re same (.9); strategize with KHB re mediation submission and information for same (.3); emails RB/Sarff re missing documents from McCann depo (.2); review site visit photos (.3).	5.50	\$2,915.00
10/22/21	B. Cade	Case investigation; download photos.	0.50	\$110.00
10/23/21	R. Bennett	Revise letter to TNL [1.0]; telephone conference with Marc Betinsky [.5]; telephone conference with Marc Betinsky [.4].	1.90	\$1,624.50
10/23/21	M. Betinsky	Multiple T/Cs with RB re 11/2 settlement conference submission (.9), review same, edit same, implement RB changes to same, emails with RB/KHB re thoughts about means to shorten letter, work on accomplishing same (2.6)	3.50	\$1,855.00
10/24/21	R. Bennett	Review, analyze and consider changes and additions to Marc Betinsky's edited redline to TNL [1.1]; review emails to Marc Betinsky and Katie Bennett [.4].	1.50	\$1,282.50
10/24/21	M. Betinsky	Prepare redline to settlement letter to Judge TNL, review, revise and implement changes to letter, email RB/KHB re same.	3.80	\$2,014.00

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10/25/21	R. Bennett	Telephone conference with Andy Noel re letter and demand [.5]; revise draft [.6]; zoom meeting with Katie Bennett and Marc Betinsky [1.0]; deal with meet and confer report [.5]; prep for and attend meet and confer scheduled by K. Sarff [1.0]; review and approve final letter to TNL [.6].	4.20	\$3,591.00
10/25/21	A. Noel	conference with RB re: demand/letter [.5]	0.50	\$365.00
10/25/21	K. Bennett	Edit settlement submission to Judge TNL and email to RB [2.3]Zoom re: letter with RB/MEB/Esther and edit letter [1.0]Discuss plan at settlement conference [.3]Review emails from Sarff re: meet and confer, prep for and attend meet and confer [.7]Debrief re: meet and confer and what should be added to ltr [.3]Begin review of McCann deposition [1.5].	6.10	\$4,178.50
10/25/21	M. Betinsky	Zoom with RB/KHB/Esther M. re settlement letter to Judge TNL and next steps, further revisions to letter (1.0), final hard read of letter and edits to same, T/Cs with RB and oversee sending same to Judge TNL (2.2); emails from Sarff re McCann written discovery (.3) and emails with RB re same (.4).	3.90	\$2,067.00
10/25/21	A. Koob	Review email from KHB regarding Sorenson records/bills, review related file materials and prepare and email response to KHB regarding same.	0.50	\$115.00
10/26/21	R. Bennett	Office conference with Marc Betinsky and Katie Bennett re settlement strategy, depos after settlement fails, next steps.	1.00	\$855.00
10/26/21	K. Bennett	Finish review of McCann deposition [2.5]Discussion re: Sarff emails/depo plan with RB [.5]Discussion re: Sarff emails/depo plan with MEB/RB [.5]Discussion re: depo plan and stip with MEB [.3].	3.80	\$2,603.00
10/26/21	M. Betinsky	Planning and strategy session with RB/KHB re settlement conference and additional depositions, emails re same with Sarff/KHB (1.0); continue review and indexing latest documents from City (.8).	1.80	\$954.00
10/27/21	R. Bennett	Work on mediation thoughts.	0.70	\$598.50
10/27/21	M. Betinsky	Continue review of and indexing latest batch of documents from City.	2.00	\$1,060.00

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10/28/21	R. Bennett	File review.	0.60	\$513.00
10/28/21	M. Betinsky	Continue indexing latest batch of documents from City.	1.30	\$689.00
10/29/21	M. Betinsky	Emails Sarff and messages CRG re deposition scheduling (.2); continue review and indexing of last batch of city documents (.5).	0.70	\$371.00
11/01/21	R. Bennett	Prep for mediation [1.4]; telephone conference with client [.3]; telephone conference with Katie Bennett [.3]; telephone conference with Marc Betinsky [.3]; review Samantha Wright action [.6].	2.90	\$2,479.50
11/01/21	K. Bennett	Review emails from Sarff and discuss with RB.	0.40	\$274.00
11/01/21	M. Betinsky	Research re other pending less-lethal cases and related civil-rights matters, strategize for settlement conference and case moving forward if matter does not settle (2.0), emails with CRG re same (.5)	2.50	\$1,325.00
11/02/21	R. Bennett	Prep for and attend settlement conference.	12.00	\$10,260.00
11/02/21	K. Bennett	Prep for and attend settlement conference.	9.80	\$6,713.00
11/02/21	M. Betinsky	Prep for and attend settlement conference with RB, KHB, and client.	10.80	\$5,724.00
11/02/21	A. Koob	Review email from KHB regarding prosthesis invoice, review records and email response with invoice and update [.2]; telephone call with KHB regarding lien amounts [.1].	0.30	\$69.00
11/03/21	R. Bennett	Conference with E. Magnanelli, Katie Bennett and Marc Betinsky post mediation information requested by TNL [.7]; telephone conference with Ronn Kreps [.5]; conference with Katie Bennett re proof to TNL [.5].	1.70	\$1,453.50
11/03/21	K. Bennett	Debrief with Esther/RB/MEB re: settlement conference/next steps [.7]Begin research on MGDPA requested by TNL and discuss/emails with MEB re: same [1.2]; conf with RB re: letter to TNL [.5]	2.40	\$1,644.00
11/03/21	E. Mignanelli	Develop strategy with K. Bennett, R. Bennett, and M. Betinsky re moving case toward resolution and action items if settlement is not approved.	0.70	\$406.00

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11/03/21	M. Betinsky	Zoom RB/KHB/ESM re status post-settlement conference and strategy for next steps (.7); research data practices act issues re bodycams and police reports for settlement discussion or potential motion practice if case does not settle, T/C with KHB re same, follow-up emails RB/KHB re same (2.3); prep memo re other pending less-lethal actions and related litigation (1.2).	4.20	\$2,226.00
11/04/21	R. Bennett	Work on final response to TNL's request	0.70	\$598.50
11/04/21	A. Noel	Review and input on Judge TNL letter.	1.10	\$803.00
11/04/21	K. Bennett	Research re: MGDPA and begin drafting letter to TNL; send to team for review [3.9]Review MEB redline [.5] and discussion with RB/MEB re: same [.9]	5.30	\$3,630.50
11/04/21	M. Betinsky	Review, revise and edit submission to Judge TNL re MGDPA issues for potential settlement (2.0), meet with RB and KHB re same (.9), format and send to Judge TNL (.1); complete memo re other pending less-lethal cases and related civil-rights matters (1.5).	4.50	\$2,385.00
11/08/21	R. Bennett	Review materials sent to TNL [.4]; telephone conference with Marc Betinsky and Katie Bennett [.3]; telephone conference with Holly McClelland [.3]; telephone conference with Soren x2 [.3]; telephone conference with TNL [.4]; telephone conference with Katie Bennett [.3]; telephone conference with Marc Betinsky [.2].	2.20	\$1,881.00
11/08/21	K. Bennett	Discuss plan/next steps with MEB/RB [.2]Discuss call with TNL with RB [.3].	0.50	\$342.50
11/08/21	M. Betinsky	Conference call RB/KHB re next steps and strategy, follow-up call with RB re information from Judge TNL re status of settlement discussions.	1.00	\$530.00
11/11/21	M. Betinsky	T/C with RB re settlement status and strategy/next steps if the matter does not resolve.	0.30	\$159.00
11/12/21	E. Mignanelli	Conversations re getting appearance entered in light of local rule precluding pro hac admission for "residents" of Minnesota.	0.20	No Charge

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11/16/21	R. Bennett	Correspondence to file [.3]; telephone conference with TNL clerk [.3]; review pleadings [.6]; telephone conference with client [.5]; telephone conference with Katie Bennett and Marc Betinsky x2 [.8].	2.50	\$2,137.50
11/16/21	A. Noel	Review and analyze Katie Bennett memos re video and communications with team.	1.50	\$1,095.00
11/16/21	M. Betinsky	Numerous telephone calls and emails with RB/KHB re potential settlement status, next steps, contact with Judge TNL, and strategize next moves in the event case does not settle.	1.50	\$795.00
11/18/21	R. Bennett	Emails to client and court.	0.60	\$513.00
11/18/21	A. Koob	Receive and begin review of records received, begin to work on summary of same for Midwest Eye Lab, M Health bills and Brave Choices.	0.70	\$161.00
11/19/21	R. Bennett	Conference with Katie Bennett, Marc Betinsky and Esther Mignanelli re motion [.9]; monitor city council meeting [.8]; telephone conference with client [.5].	2.20	\$1,881.00
11/19/21	K. Bennett	Review city council meeting agenda/watch meeting [.5] Meeting with team re: motion practice/confidentiality issues and next steps [.9] Review RB correspondence with TNL and discuss [.4].	1.80	\$1,233.00
11/19/21	M. Betinsky	T/Cs and emails RB/KHB re settlement update from Judge TNL and city council meeting (.5); review memo and email re latest medicals (.3).	0.80	\$424.00
11/19/21	A. Koob	Finalize review and summary/update of Brave Choices records, Midwest Eye Lab records, update billing and request indexes and email updates to KHB, RB, AJN and MEB.	2.10	\$483.00
11/23/21	R. Bennett	Telephone conference with client.	0.60	\$513.00
11/23/21	K. Bennett	conference with RB/MEB re discovery issues and plan [1.0]	1.00	\$685.00
11/23/21	K. Bennett	Begin review of production indexes/depo exhibit lists for memo on improper designation [.7]; strategize with RB/MEB re: outstanding discovery [1.0]	1.70	\$1,164.50

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11/23/21	M. Betinsky	Strategize with RB/KHB re next steps and outstanding discovery issues.	1.00	\$530.00
11/24/21	R. Bennett	Conference with Marc Betinsky and Katie Bennett re action plan [.6]; telephone conference with Ronn Krepps [.4].	1.00	\$855.00
11/24/21	K. Bennett	Finalize review/memo re: improper designations and send to team [1.5]Emails and discussions with team re: plan/motion/ideas for arguments [.9]Review updated medical records summaries [.4].	2.80	\$1,918.00
11/24/21	M. Betinsky	Emails re strategy for potential motion re overdesignation of confidential materials and review list of improperly designated document categories.	0.40	\$212.00
11/29/21	E. Mignanelli	Begin drafting motion to enforce compliance with protective order in light of over-designation of discovery as confidential (1.1); draft letter to opposing counsel re over-designation of material as confidential (4).	5.10	\$2,958.00
11/29/21	M. Betinsky	Emails with E. Mignanelli re letter to Sarff regarding improper document designations, review draft letter.	0.40	\$212.00
11/30/21	R. Bennett	Review Esther's draft letter.	0.50	\$427.50
11/30/21	E. Mignanelli	Continue drafting motion to enforce compliance with protective order in light of over-designation of discovery as confidential.	2.70	\$1,566.00
11/30/21	M. Betinsky	Emails and T/C with E. Mignanelli re challenge to document designations, letter to Sarff re same.	0.40	\$212.00
12/01/21	E. Mignanelli	Finish initial draft brief in support of motion seeking to fix defendants' improper confidentiality designations.	9.70	\$5,626.00
12/02/21	R. Bennett	Telephone conference with client.	0.50	\$427.50
12/02/21	R. Bennett	email and respond to Sarff [.3]; conf with K. Bennett and Marc Betinsky to finalize letter [.5]	0.80	\$684.00
12/02/21	M. Betinsky	Review E. Mignanelli letter and brief re changes to confidentiality designations.	2.20	\$1,166.00
12/03/21	K. Bennett	Call with Esther re: letter to Sarff [.6]Calls with Marc re: letter to Sarff on discovery deficiencies [.8]Calls with RB re: deficiency letter [.4].	1.80	\$1,233.00

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12/03/21	E. Mignanelli	Correspondence with M. Betinsky, R. Bennett, and K. Bennett re changes to be made to draft correspondence to opposing counsel re various outstanding discovery issues, and begin revising letter to opposing counsel in light of same.	1.70	\$986.00
12/03/21	M. Betinsky	T/C with KHB re draft letter to Sarff re outstanding discovery issues, follow-up T/Cs with RB, E. Mignanelli re same (1.0), legal research re appropriate answers and certification of interrogatory responses by counsel for party, revise and edit letter to Sarff (3.3); emails re deposition scheduling (.2).	4.50	\$2,385.00
12/06/21	R. Bennett	Work on discovery scheduling with K Bennett and M Betinsky and depo outlines.	1.70	\$1,453.50
12/06/21	K. Bennett	Review emails re: depositions and discuss with RB [4]Begin prepping for Severance deposition (reviewing discovery hot docs and drafting deposition outline) [4.4]Continue drafting outline and circulate to team for review [2.2].	7.00	\$4,795.00
12/06/21	E. Mignanelli	Finish initial draft communications to defense counsel re improper confidentiality designations, gaps in document production and in defendants' answers to interrogatories (4.3); review and analyze defendants' previous discovery responses in preparation for same (1).	5.30	\$3,074.00
12/06/21	M. Betinsky	Brief review of Severance deposition outline (.4) and letter to Sarff re outstanding discovery issues (.4); emails KHB/E. Mignanelli re same (.2); T/C with RB/KHB re Severance deposition and scheduling/logistics issues and attention to same (.5).	1.50	\$795.00
12/06/21	B. Cade	Case investigation.	0.50	\$110.00
12/07/21	R. Bennett	Telephone conference with Katie Bennett x4 re Sarff letter [1.2]; telephone conference with Marc Betinsky re strategy with Sarff letter [.5]; review and revise Severance depo outline [2.5]; conference with Marc Betinsky and Katie Bennett to finalize letter [.5].	4.70	\$4,018.50

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12/07/21	K. Bennett	Review updated draft letter to Sarff re: discovery/PO issues; review letter to TNL on MGDPA [1.2]Discuss plan and ideas with RB [1.5]Discuss plan and ideas with MEB [1.6]Begin editing letter and circulate [2.2]Review RB edits/discuss and circulate [1.4]Depo prep for Severance [1.8]Review MEB edits; review RB edits to depo outline and continue drafting [2.5]Review emails re: scheduling of depositions and discuss [1.2].	8.40	\$5,754.00
12/07/21	E. Mignanelli	Review and analyze final correspondence sent to opposing counsel re discovery deficiencies.	0.30	\$174.00
12/07/21	M. Betinsky	Review and revise draft letter to Sarff re numerous discovery issues/prepare redline (2.0) T/Cs with RB/KHB re same, emails re same (.6); emails/messages re deposition scheduling (.2); review, revise and edit Severance deposition outline (1.5), T/C with RB re same and strategy, T/C with KHB re same (.3), review RB edits and adds to outline (.5).	5.10	\$2,703.00
12/08/21	K. Bennett	Continue editing Severance outline/depo prep and organizing exhibits [5.1].	5.10	\$3,493.50
12/08/21	M. Betinsky	Prep for Severance depo.	0.50	\$265.00
12/09/21	K. Bennett	Continue editing deposition outline for Severance and send to group [2.8]Finalize exhibits for Severance deposition [1.4].	3.20	\$2,192.00
12/09/21	M. Betinsky	Prep for Severance depo and attend to logistics for same, emails re same.	1.20	\$636.00
12/10/21	R. Bennett	Attend Severance depo in part and conference with Katie Bennett and Marc Betinsky.	2.50	\$2,137.50
12/10/21	K. Bennett	Prep for and attend depo of Defendant Severance.	8.50	\$5,822.50
12/10/21	E. Mignanelli	Revise draft brief in support of motion seeking to fix defendants' improper confidentiality designations, and communications with case team re same.	3.80	\$2,204.00
12/10/21	M. Betinsky	Final prep for and attend Severance deposition, debrief afterwards with RB/KHB.	6.50	\$3,445.00
12/13/21	R. Bennett	Review draft of brief by Esther [1.6]; telephone conference with Katie Bennett and Marc Betinsky re Jack Ryan [1.4].	1.00	\$855.00

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12/13/21	K. Bennett	Discuss next steps and expert strategy with RB/MEB [.4]Email to Jack Ryan re: zoom meeting request [.2].	0.60	\$411.00
12/13/21	M. Betinsky	conference call with RB/KHB re: Jack Ryan and expert issues [.4]	0.40	\$212.00
12/13/21	A. Koob	Update medical summary with most-recent records received, Midwest Eye Labs, Brave Choices [.9]; receive and review M Health Fairview updated billing, review of bills received to date and organize billing index, emails to K. Lyons regarding outstanding records, multiple emails with K. Lyons and D. Roisum regarding outstanding records, update billing index to reflect bills received from M Health Anesthesia providers that had been outstanding, email to D. Roisum, receive and begin review of updated M Health medical records and begin to work on summary of same [3.3].	4.20	\$966.00
12/14/21	K. Bennett	Review reworked draft/MEB edits and comments, emails from team re: improper designation.	2.10	\$1,438.50
12/14/21	M. Betinsky	Review draft motion re confidentiality designation and edit same, emails RB/KHB re same (1.5); emails re Jack Ryan consultation and meeting (.2).	1.70	\$901.00
12/14/21	A. Koob	Complete review of updated M Health records and summary of same, finalize summary [1.6]; add updates from M Health records to medical summary [.3]; receive and brief review of Hennepin County Specialty Clinics updated records, compare bills received to previously received bills from HCMC, email to K. Lyons regarding missing bill for 10.07.21 appointment and update to request index [.5].	2.40	\$552.00
12/16/21	A. Koob	Receive and review email from D. Roisum regarding missing records and review billing index and request index and respond to same [.3]; receive and review missing 10.07 billing record and additional billing for Watcrott visit and update to billing index [.3]; compare bills to records to make sure all accounted for and emails to D. Roisum regarding missing records [.1]; receive and review HCMC Specialty Clinic records and prepare summary of same and update to request index [4.7].	5.40	\$1,242.00

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12/17/21	R. Bennett	Review revised brief re over designation; review and respond to Sarff email re depositions [.5]; telephone conference with client [.5]; details re BITS held email and IME [.7].	2.70	\$2,308.50
12/17/21	K. Bennett	Review updated draft of memo re: confidentiality designations and emails re: same.	2.00	\$1,370.00
12/17/21	E. Mignanelli	Revise and edit brief in support of motion to change confidentiality designations in light of M. Betinsky's review, and draft communications re same to R. Bennett, K. Bennett, and M. Betinsky.	2.80	\$1,624.00
12/17/21	M. Betinsky	Emails re deposition scheduling and IME/encryption issues (.3); review latest medicals (.2).	0.50	\$265.00
12/17/21	A. Koob	Finalize summary of updated HCMC Specialty Clinic records and email to KHB, RB and MEB.	0.80	\$184.00
12/18/21	M. Betinsky	Review RB edits to brief re confidentiality designations and emails re same.	0.30	\$159.00
12/19/21	E. Mignanelli	Analyze R. Bennett's comments and suggestions for confidentiality brief.	0.60	\$348.00
12/19/21	M. Betinsky	Emails re motion concerning confidentiality and edits to same.	0.20	\$106.00
12/20/21	R. Bennett	Telephone conference with Jack Ryan and CRT [.8]; conference with Esther/Katie Bennett/Marc Betinsky re brief [1.0]; work on letter to TNL with Katie Bennett [.7]; telephone conference with Marc Betinsky re edits and filing [.5].	3.00	\$2,565.00
12/20/21	K. Bennett	Review updated memo and write notes re: edits [1.2]Call with Jack re: plan/deadlines/materials and overview of developments in case [.7]Zoom meeting with Esther/RB/MEB re: edits and plan for redesignation memo [1.2]Review caselaw re: Bauer depo/admission from Marks [.4]Review last status letter and draft status ltr to TNL; review with RB/MEB and review final submission [2.0].	5.50	\$3,767.50
12/20/21	E. Mignanelli	Conference with M. Betinsky, R. Bennett, and K. Bennett re direction of motion re improper and voluminous confidentiality designations (1); and continue revising brief in light of same (7.6).	8.60	\$4,988.00

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12/20/21	M. Betinsky	Conference call with RB/KHB and Jack Ryan re expert report and opinion (.8); review RB edits to latest draft motion re confidentiality designations and conference with E. Mignanelli/RB/KHB re changes to same and strategy (2.2); review RB letter to Judge TNL re status update, revise and edit same, finalize letter and send to Judge TNL (.8); emails Sarff/RB re depositions and scheduling (.2); conf with RB re: ltr/filing (.5)	4.50	\$2,385.00
12/20/21	A. Koob	Office conference with KHB regarding supplementing records [1.1]; begin to work on supplemental document production including review of documents previously produced, pulling new documents, redaction, bates numbering and confidential stamping [1.7].	1.80	\$414.00
12/21/21	R. Bennett	Review Sarff email re witnesses - depos [1.3]; email client and Marc Betinsky - A.Koob re action plan [1.7]; review Esther's draft [1.7].	1.70	\$1,453.50
12/21/21	K. Bennett	Review updated memo re: redesignation and unsealing of complaint/redline and circulate [1.1]Review file/pull exhibits for Esther/email Molly re: letters [1.4]Review emails with Sarff re: depositions scheduling [1.4]Emails with Soren re: deposition scheduling [1.4]Call to Soren re: same/Liz [1.3]Review Liz memo/notes from ATK and call/text Liz re: deposition [1.5]Review updated memo/edit [1.0].	4.10	\$2,808.50
12/21/21	E. Mignanelli	Communications with case team re motion to unseal complaint and re confidentiality designations (.1); begin drafting declaration in support of confidentiality motion and search for exhibits to attach to same (1).	1.10	\$638.00
12/21/21	M. Betinsky	Review, revise, edit and redline memo in support of motion re confidentiality designations, emails with RB/KHB/ESM re same (3.0); emails re deposition scheduling, T/C with RB re same, emails client re same, T/C with KHB re same (.6); review memos re witness interviews (.4).	4.00	\$2,120.00
12/21/21	A. Koob	Continue to prepare and finalize documents for production [2.9]; upload materials for production, prepare Certificate of Service and email service to defense counsel with supplemental documents [1.3].	3.20	\$736.00

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12/21/21	A. Koob	Review emails from RB regarding interviews of Jamee and Elizabeth, review memos and respond to same [.2]; review of materials related to G. Merry and email to KHB, RB and MEB regarding same, multiple emails to/ from Soren and RB and KHB regarding upcoming depositions and who will be deposed [.4].	0.60	\$138.00
12/22/21	R. Bennett	Further review of draft brief and emails [.8]; review motions and declaration [.5]; telephone conference with Katie Bennett re meet and confer and results of telephone conference with Sarff [.7]; review Marc Betinsky email re Griffin Merry [.3].	2.30	\$1,966.50
12/22/21	K. Bennett	conference with RB re: meet and confer with Sarff/plan for motion/request to wait to file; update remainder of team re: same [1.6]	1.60	\$1,096.00
12/22/21	E. Mignanelli	Revise brief in support of motion to unseal complaint and re confidentiality in light of M. Betinsky and K. Bennett's reviews and edits (1.0); draft motion, proposed order, notice of hearing, declaration in support of motion, and other certificates of compliance to accompany filing of motion (2.1); communications with case team and final revisions in anticipation of filing of motion (1.2).	4.30	\$2,494.00
12/22/21	M. Betinsky	Review all documents to be filed with motion re confidentiality designation, review, revise and edit brief re same, meet with KHB re same, meet with ESM re same, revise meet and confer statement and distribute, review email history with Sarff re same, conf. call with KHB/ESM re strategy and meet and confer with Sarff, next steps (3.5); work on deposition scheduling, T/C with Griffin Merry re same, update CRG re same, email Sarff (.5).	4.00	\$2,120.00
12/23/21	A. Koob	Emails with D. Roisum regarding Stevenson records/billing and review electronic file regarding same.	0.20	\$46.00
01/05/22	R. Bennett	Phone call with client (.4); phone call with K. Sarff (.3).	0.70	\$598.50
01/06/22	R. Bennett	Emails and text to and from client (.5).	0.50	\$427.50

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01/06/22	K. Bennett	Email team re: deposition plan [.4]Emails and discussions with team re: Sarff no-reply/filing of motion; email Brenda re: potential filing tomorrow re: re-designations [.6].	1.00	\$685.00
01/06/22	E. Mignanelli	Revise meet and confer statement to accompany anticipated filing of confidentiality motion and motion to unseal.	0.30	\$174.00
01/06/22	M. Betinsky	Emails re deposition planning (.2); emails re motion concerning confidentiality designations (.2).	0.40	\$212.00
01/07/22	R. Bennett	Review Sarff letter and our motions and filings.	2.00	\$1,710.00
01/07/22	K. Bennett	Review and edit meet and confer statement [.6]Review emails re: redesignation motion; email re: same [.6].	1.20	\$822.00
01/07/22	E. Mignanelli	Finalize memorandum in support of motion to seal and related submissions (3.1); review and analyze local rules and procedures provided in J. TNL's protective order to conform sealing process to same (.6)' communication and coordination with staff completing filing (.5).	4.20	\$2,436.00
01/07/22	M. Betinsky	Attention to motion re confidentiality designations, review and revise submissions with same, T/C with ESM re same and filing same, numerous emails re same (1.0); review Sarff letter re same (.2); emails re deposition scheduling (.2).	1.40	\$742.00
01/08/22	K. Bennett	Review Sarff's response to Dec 7 letter [1.0].	1.00	\$685.00
01/10/22	R. Bennett	Phone call with K. Bennett re: deponents (.3); email re: deposition of additional witnesses (.2).	0.50	\$427.50
01/10/22	K. Bennett	Email re: additional deponents to team [.2]; email Sarff re: Caspers, Arradondo and Bauer availability [.2].	0.40	\$274.00
01/10/22	K. Bennett	conference with RB re: deponents [.3]	0.30	\$205.50
01/10/22	K. Bennett	conference with RB re: depositions [.4]	0.40	\$274.00
01/11/22	K. Bennett	Being prepping/drafting outline for Caspers deposition [2.1].	2.10	\$1,438.50
01/11/22	A. Koob	Emails regarding Severance video depos, retrieve flash drive, review and download same, email to KHB and telephone call with KHB.	0.70	\$161.00

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01/12/22	K. Bennett	Continue depo prep for list of upcoming depos/strategize re: claims in complaint [1.2]Begin review of Severance deposition [2.8].	4.00	\$2,740.00
01/13/22	R. Bennett	Phone call with K. Bennett re: deposition (.6); calls/emails with M Betinsky re: fact witnesses [.3]	0.90	\$769.50
01/13/22	K. Bennett	Finish review of Severance deposition [1.0]Strategize re: deposition plan; email team re: same [1.0]Call to RB re: plan; draft email to Sarff/email Sarff re deponents and extension [.7]Continue drafting Caspers deposition outline [2.0]Review scheduling order [.2].	4.90	\$3,356.50
01/13/22	M. Betinsky	T/C with RB re deposition planning, emails re same, messages with Griffin Merry re Feb 22 deposition, emails RB/KHB re same and logistics.	0.40	\$212.00
01/14/22	R. Bennett	Phone call with K. Bennett re: depos (.4); phone call with client (.3); review outline for Caspers depo and BRRT 40mm shooter and BWC data (1.0); review motion response and email team (1.4).	3.10	\$2,650.50
01/14/22	K. Bennett	Finalize draft depo outline for Caspers [2.4]Review BWC video and supplemental reports/draft outlines re: additional personnel with 40 mm launchers/disqualifying evidence [2.6].	5.00	\$3,425.00
01/14/22	M. Betinsky	Brief review of opposition to confidentiality motion, emails RB/KHB/ESM re same.	0.20	\$106.00
01/15/22	K. Bennett	Review defendants' memo [2.0]Review emails from team re: same [.4]Call with RB to strategize [.3]Email team with ideas for argument; email team re: next steps [.5].	3.20	\$2,192.00
01/15/22	E. Mignanelli	Review and analyze defendants' response to motion to unseal complaint and change confidentiality designations.	0.70	\$406.00
01/15/22	M. Betinsky	T/C RB re confidentiality motion, email RB/AJN/KHB/ESM re same and thoughts for response/argument.	0.50	\$265.00
01/16/22	E. Mignanelli	Analyze primary authorities relied upon by defendants in response to motion to unseal and draft and argument outline in preparation for hearing on same.	3.80	\$2,204.00
01/16/22	M. Betinsky	Review opposition to motion re confidentiality, email thoughts for arguments to RB/KHB/ESM, review ESM argument outline.	1.30	\$689.00

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01/17/22	R. Bennett	Review Mille Lacs county subpoena and revise same (.6); phone call with K. Bennett re: Mille Lacs subpoena changes (.4); further review of defendants responses to ur motion; review EM's and KHB's argument outline and draft proposal to make additional arguments to reorganize (1.7); attend zoom re: same with KHB/EM and MB (1.0).	3.70	\$3,163.50
01/17/22	K. Bennett	Review Esther's outline for argument/edit and recirculate; review MEB's notes re: argument and strategize [2.2]Prep for meeting with team and attend zoom meeting re: argument and reply brief [1.4]Review scheduling order and draft Stip for Extension [1.0]Strategize re: 40 mm launcher depositions [1.4]review and discuss video with MEB and how to best use evidence at depositions [1.6]Draft subpoena and exhibit a to Mille Lacs County and circulate to team; review edits [1.6]Draft status update letter to TNL and circulate [4].	8.30	\$5,685.50
01/17/22	E. Mignanelli	Conference with case team re strategy for replying to arguments in defendants' response to motion to unseal (1); begin outlining issues raised in each of the cases relied upon in defendants' response (.8).	1.80	\$1,044.00
01/17/22	M. Betinsky	T/C with RB, Zoom with RB/KHB/ESM re confidentiality motion, reply brief, arguments for same, etc. (1.3); review draft subpoena to Mille Lacs, T/Cs with KHB re same and stip for extension of time, strategy for impending depositions, emails re same (.5).	1.80	\$954.00
01/18/22	R. Bennett	Phone call with K. Bennett re reply brief request (.3); phone call with K. Bennett re: schedule, plan and stipulation (.4).	0.70	\$598.50
01/18/22	K. Bennett	conf with RB re: scheduling depos/stipulation for extension [4]	0.40	\$274.00
01/18/22	K. Bennett	Calls/emails to chambers re: reply brief [2]Review RB edits to Feb 1 status update letter and finalize [3]Review emails to Sarff re: depos/deadlines and develop plan if no response [3].	0.80	\$548.00
01/19/22	R. Bennett	Review Mille Lacs subpoena (final) (.4).	0.40	\$342.00
01/19/22	K. Bennett	Review, edit and finalize subpoena materials to MLC SO; email instructions to Brenda [1.5].	1.50	\$1,027.50

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01/19/22	A. Koob	Email to B. Zwinger regarding service and review of various emails regarding service of subpoenas.	0.10	\$23.00
01/20/22	R. Bennett	Review deposition schedule (.3); phone call with K. Bennett re dates need to be secured (.4); call with M. Betinsky and K. Bennett re: approach to depos, scheduling and need for 60 day rather than 30 day extension give Sarff's failure to reply (.5); review Sarff email regarding depos and schedule; phone call with K. Bennett re: same (.8); phone call with K. Bennett and Sarff re: depositions and schedule (.6); phone call with M. Betinsky and K. Bennett and schedule (.6).	3.20	\$2,736.00
01/20/22	K. Bennett	Call and email to Sarff [.5]Begin prep and depo outline for Angerhofer [4.0]Review emails from Sarff [.4]Calls with RB [1.2]Call with RB/Sarff [.6]Call with RB/MEB re: staffing and next steps re: upcoming depositions [1.1].	7.80	\$5,343.00
01/20/22	M. Betinsky	Conf call with RB/KHB re impending depositions, scheduling and coverage, strategy for same (1.1), emails Sarff and RB/KHB re schedule, follow-up call with KHB re video for depositions and strategy re timestamps on videos/use in depositions (.7)	1.80	\$954.00
01/20/22	A. Koob	Emails regarding McCann transcript [.2]; telephone call with KHB regarding videos for McCann deposition [.1]; emails regarding Gerlicher and review materials received to date [.6]; receive and review emails from KHB with McCann video depositions and download, save and review of same [.8].	1.70	\$391.00
01/21/22	R. Bennett	Call with K. Bennett and M. Betinsky re: pinning BWC timer down.	0.80	\$684.00
01/21/22	K. Bennett	Finalize draft of Angerhofer deposition outline [1.5]Continue prep for Caspers and 40 mm launchers/SWAT 1280 depositions [1.4]Strategy call with MEB/RB re: video evidence/Chris Sullivan [4].	3.30	\$2,260.50
01/21/22	M. Betinsky	Numerous T/Cs with RB/KHB re deposition strategizing, use of still frames, and deposition coverage/planning.	1.00	\$530.00

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01/22/22	K. Bennett	Review McCann Video deposition to strategize re: Caspers deposition [1.0]Review McCann BWC; Muridi BWC re: Caspers and BRRT identification depositions [1.4].	2.40	\$1,644.00
01/22/22	E. Mignanelli	Begin drafting reply brief in support of motion to unseal and change defendant's improper confidentiality designations.	6.40	\$3,712.00
01/23/22	R. Bennett	Review Gerlicher outline for depositions; review Gerlicher interview including exhibits.	3.00	\$2,565.00
01/24/22	R. Bennett	Phone call with M. Betinsky re: draft reply brief x2 (1.1); review E. Mignanelli draft reply brief (1.0); review Caspers diagrams/outline (.5); review depo notices (.4).	3.00	\$2,565.00
01/24/22	K. Bennett	Continue review of BWC and finalize Caspers depo outline; circulate to team [3.0]Strategize re: SWAT 1280 depositions and continue review of BWC and time difference analysis [2.5]Create exhibits re: time differences of BWC [1.0]Email Chris re: Hakanson video [.2]Discuss Hakanson with RB; Monnell claim [.3]Review re-draft of reply to unseal/redesignate and send edits [1.2]Review email from Esther and send schedule for Stevenson [.2].	8.40	\$5,754.00
01/24/22	E. Mignanelli	Finish draft reply brief (3.8); conference with M. Betinsky re same and revise draft reply brief accordingly (1.1); draft joint motion for continued sealing and required attachment to same (.6).	5.60	\$3,248.00
01/24/22	M. Betinsky	T/Cs with RB re reply brief in support of confidentiality motion (1.1), review brief, T/Cs and emails with RB/KHB/ESM re same, edit and revise brief (4.1); emails re deposition scheduling and outlines for depositions, emails Sarff re subpoenas and deposition notices (.3).	5.40	\$2,862.00
01/25/22	R. Bennett	Deal with expert report issues (1.0); phone call with K. Bennett (.4); phone call with M. Betinsky and K. Bennett re: video with Soren (.3); review and revise reply brief (.4); phone call with client (.3).	2.40	\$2,052.00

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01/25/22	K. Bennett	Review updated draft of motion to unseal [.8]Call with MEB re: strategy for hearing [.6]Email Brenda re: deposition notices [.2]Email to Brenda re: hearing and binder [.2]Review depo notices/subpoenas; email to Soren re: deposition notice and prep session; call to Jamee and text to client re: email for Jamee [.8]Call with MEB re: depo plan and info to lay witnesses [.3]Begin drafting depo outline for Meath [2.5].	5.40	\$3,699.00
01/25/22	K. Bennett	Review motion to seal and email Sarff to re: agreeing to unseal [.3]; conf with RB/MEB re: video with Soren [.3]	0.60	\$411.00
01/25/22	M. Betinsky	Attention to deposition planning, T/Cs with KHB re same (.6), T/Cs with RB re subpoenas from Sarff and depo notices (.2), T/C with Griffin Merry re subpoena and deposition date and follow-up emails with him and RB/KHB (.8), T/C with Nick Adler re Instagram video showing Soren's shooting and follow-ups with him and KHB (.6); T/Cs with RB and KHB re reply on confidentiality motion and edits/changes to same, messages ESM re same and finalizing brief (1.0); emails re continued-sealing motion and best approaches with Sarff and discovery extension deadlines/strategy (.4).	3.60	\$1,908.00
01/25/22	A. Koob	Telephone call with RB regarding transcripts for Soren review, prepare transcripts for Soren and email same to Soren.	0.30	\$69.00
01/25/22	C. Sullivan	Preparation of body cam video graphics per K. Bennett.	1.50	\$420.00
01/26/22	R. Bennett	Review Anthony Caspers depo outline in detail (1.0); provide suggestions and approaches with K. Bennett (.8); review attachments (.5); review revised outline and Caspers BWC video (1.0)	3.30	\$2,821.50
01/26/22	K. Bennett	Review/finalize reply brief and emails re: same [.5]Conf call with RB on Caspers outline [.6]Research Caspers background, strategize re: depo and edit outline [5.1]Continue prepping for SWAT 1280 depositions, begin drafting Meath's deposition outline [2.4]Review stills from Chris Sullivan and information on time difference [2.0].	10.60	\$7,261.00

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01/26/22	M. Betinsky	Messages with Griffin Merry re Instagram video and impending deposition, emails re strategy for depositions, etc (.4); attention to getting reply on confidentiality filed (.2).	0.60	\$318.00
01/26/22	A. Koob	Emails with MEB regarding sending video of Soren aftermath of shooting video to Griffin Merry, upload video and send/email video of same to Griffin Merry, emails with Griffin Merry.	0.30	\$69.00
01/26/22	C. Sullivan	Preparation of body cam video graphics per K. Bennett.	5.50	\$1,540.00
01/27/22	R. Bennett	Review Baude 8th Circuit opinion and call with K. Bennett re: same (.6); call with KHB re: BWC evidence and presentation (1.3); review Mille Lacs County and phone call with K. Bennett (.9); rule out Mille Lacs County Swat as Stevenson shooter (.5).	3.30	\$2,821.50
01/27/22	K. Bennett	Continue review of stills from Chris Sullivan [1.4]Distill BWC time difference and set up call with Chris [.8]Begin drafting Seely's deposition outline [5.7]Discuss strategy with 40 mm shooters with RB [.4]; discuss same with MEB [.2]Review email and subpoena response from Mille Lacs [.8]Calls to RB and MEB re: same [.5]Email Seely dep outline to team [.2].	10.00	\$6,850.00
01/27/22	M. Betinsky	T/Cs with KHB re still frames from bodycams, Stevenson depositions and strategy (.4); T/C with KHB re subpoena response from Mille Lacs and review documents re same (.3); emails re continued joint sealing re confidentiality motion (.2).	0.90	\$477.00
01/28/22	K. Bennett	conf call with MEB re: depo strategy, scheduling, next steps [.5]	0.50	\$342.50
01/28/22	K. Bennett	Review proposed Joint Motion edits; review pgs re: D motion and add Plaintiff's section/circulate to team with rationale and finalize/send to Brenda [.5]Being prepping for hearing on motion to unseal [1.3]Begin drafting Kaminski deposition outline [2.3]Email Kaminski to MEB/RB and link to T drive with frame by frames and outline key pages [.3]Email Mille Lacs documents and response from Joe Walsh to Sarff [.2]Review Dr. Ali M.'s expert report and discuss with RB [1.2].	4.60	\$3,151.00

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Date	Timekeeper	Description	Hours	Fees
01/28/22	E. Mignanelli	Assist K. Bennett in communications with opposing counsel and finalization of joint sealing motion, and review and analyze third party discovery produced by Mille Lacs County Sheriff's Department.	0.70	\$406.00
01/28/22	M. Betinsky	Review draft Caspers deposition outline and prepare thoughts for same (1.3); further review of Mille Lacs documents and emails KHB re same (.2); emails re continued sealing motion and changes to same (.2); conference call with team re depositions, strategy, scheduling and next steps (.5).	2.20	\$1,166.00
01/31/22	R. Bennett	Phone call with K. Bennett re: depo (.4); phone call with M. Betinsky rel letter to Judge TNL re status update (.4); review draft of status update letter to Judge TNL; edit/add changes (.9); phone call with K. Bennett re: Sarff no show (.5); phone call with K. Bennett re: Caspers depo (.5); further revisions to letter and phone call with M. Betinsky re: same (.7).	3.40	\$2,907.00
01/31/22	K. Bennett	Continue to prep for Caspers deposition [2.4]Discuss with team re: Sarff's message to reception; call Sarff; email Sarf [6]Attend deposition of Caspers [2.5]Debrief with MEB/RB and send key testimony to team [8]Review and edit update letter to TNL [5]Review edits from RB/MEB and approve for sending [8].	7.60	\$5,206.00
01/31/22	K. Bennett	Email Sarff re: outstanding deposition scheduling [4].	0.40	\$274.00
01/31/22	M. Betinsky	Final prep for Caspers deposition, attend deposition, deal with Sarff no-show and strategize email, debrief with RB after depo, attend to exhibits for same, strategize next steps and impending depositions (4.3); review, revise and edit status update letter to Judge TNL, T/Cs with RB and emails RB/KHB re same (2.2).	6.50	\$3,445.00
01/31/22	A. Koob	Receive and review Mille Lacs County documents, save same to T Drive [2]; review subrogation information, telephone call to Hennepin Health (left voicemail) and email to Hennepin Health regarding updated itemization request [2]	0.40	\$92.00
01/31/22	C. Sullivan	Preparation of graphics per K. Bennett.	3.00	\$840.00
02/01/22	R. Bennett	Phone call with K. Bennett and M. Betinsky regarding damages, deposition and proof.	1.50	\$1,282.50

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02/01/22	K. Bennett	Draft deposition outline for Sgt. Johnson and circulate to team with plan [2.3]Email Exhibits from Caspers to Jane [.2]Review frame by frames and BWC time analysis; strategize re: depositions of 1280 and Bauer [4.0]Review findings with MEB via zoom conference [1.0]Emails with Soren re: depo prep [.2]Emails with Brenda/Trial Support re: hearing [.3].	8.00	\$5,480.00
02/01/22	M. Betinsky	ZOOM with KHB re bodycams and stillframes/frame-by-frame breakdown of same and strategize for impending depositions, numerous emails re same (1.5); emails Sarff re deposition scheduling (.2); emails Soren re prep session for deposition and document review, etc (.3); emails re logistics for hearing on confidentiality motion (.2); final revisions to update letter to Judge TNL and send same (.2).	2.40	\$1,272.00
02/01/22	A. Koob	Email from J. Hanslick regarding access to documents and email to KHB regarding same.	0.10	\$23.00
02/01/22	C. Sullivan	Preparation of graphics per K. Bennett.	2.00	\$560.00
02/02/22	R. Bennett	Review and revise email to K. Sarff (.5); phone call with K. Bennett re: deposition (.5); email A. Koob (.3); depo strategy with M. Betinsky and K. Bennett (1.5); phone call with client (.5); organize client's visit (.5).	3.80	\$3,249.00
02/02/22	K. Bennett	Review Sarff's scheduling email; review Scheduling order, calendar; draft response and circulate to team to check schedules and review past scheduling emails [1.3]Prep, strategize re: upcoming 40 mm depositions [2.4]Prep, strategize re: upcoming Monell depositions [3.4]Continue prepping for hearing on Confidentiality designations - pull cases, review [1.7]Strategize with RB re: Soren prep/depo [.4].Depo strategy call with RB/MEB [1.5]	10.70	\$7,329.50
02/02/22	E. Mignanelli	Development of strategy for SWAT 1280 officer depositions, and correspondence with opposing counsel re scheduling of same.	0.40	\$232.00
02/02/22	M. Betinsky	Conf call with RB/KHB re deposition planning, scheduling and strategy (1.5); review draft emails re same, emails KHB/Sarff re same (.2)	1.70	\$901.00

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02/02/22	A. Koob	Review email from RB regarding request for materials for client review in advance of deposition and respond to same.	0.10	\$23.00
02/03/22	R. Bennett	Phone call with M. Betinsky and K. Bennett re: motion argument (1.0); review medical records to prep Soren for deposition (2.5); phone call with A. Koob (.5).	4.00	\$3,420.00
02/03/22	K. Bennett	Continue prep for argument - review cases, briefs and strategize re: outline, powerpoint and anticipation of TNL's questions [7.9]; conf with RB/MEB re: strategy and argument ideas [1.0]	8.90	\$6,096.50
02/03/22	M. Betinsky	Conference call with RB/KHB re strategy and arguments for confidentiality motion hearing, strategize re same (1.0); emails Sarff and RB/KHB re deposition planning, T/Cs RB/KHB re same (.4).	1.40	\$742.00
02/03/22	A. Koob	Review/gather medical records/summary of same for RB for client deposition preparation, updates to medical summary and email to RB with materials for review [4]; telephone call with RB regarding deposition prep materials and email Dr. Sher's report to RB [.5].	4.50	\$1,035.00
02/04/22	R. Bennett	Phone call with M. Betinsky re: Chris Sullivan expert/lay status (.4); review Johnson outline and emails (1.0); phone call with Rochelle Olson (.3).	1.70	\$1,453.50
02/04/22	K. Bennett	Continue prep for Bauer and additional 40 mm launcher operators' depositions - review of frame by frames, review of BWC and time differences; continue drafting outlines [3.3]Continue preparation for hearing on motion to unseal and de-designation [4.2].	7.50	\$5,137.50
02/04/22	M. Betinsky	Review Johnson deposition outline and emails RB/KHB re same (.4); T/C with KHB re arguments and strategy for confidentiality hearing before TNL (.4); emails re press at confidentiality hearing and hearing notice (.2).	0.80	\$424.00
02/06/22	K. Bennett	Continue prep for argument/outline and edit powerpoint [1.2].	1.20	\$822.00
02/07/22	R. Bennett	Review K. Bennett argument and powerpoint (.7); phone call with K. Bennett re: thoughts (.5); review additions (.3); review medical (.6).	2.10	\$1,795.50

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02/07/22	K. Bennett	Continue to prep for hearing [4.0]Review scheduling emails, prep subpoenas and zoom info and depo notices [1.0]Review medical summaries/records and draft list/rationale for proposed medical experts [.9]conf with RB re: powerpoint/argument [.5]	6.40	\$4,384.00
02/08/22	R. Bennett	Phone call with K. Bennett re: argument (.5); attend argument of motion re: "Confidentiality" with Judge TNL and phone call with K. Bennett and E. Mignanelli afterward (2.0).	2.50	\$2,137.50
02/08/22	K. Bennett	Review argument outline/strategize/edit and prep for argument [3.4]Mtg with Esther to prep for argument [1.0]Attend argument [1.2]Debrief re: argument and discuss next steps with team [.6].	6.20	\$4,247.00
02/08/22	E. Mignanelli	Prepare for and attend argument on confidentiality motion and motion to unseal.	3.10	\$1,798.00
02/08/22	M. Betinsky	T/C with KHB re arguments and strategy for confidentiality motion hearing, follow-up with KHB/RB/ESM following hearing and takeaways, strategizing next steps (.8); emails re deposition planning and strategy (.4).	1.20	\$636.00
02/08/22	N. Adler	Review file- Prep for meeting.	1.50	\$330.00
02/09/22	R. Bennett	Prepare for and attend pre deposition conference with client (3.0); phone call with K. Bennett re: Stevenson depositions and strategy (.9); review Rule 68 Offer and separate call with M. Betinsky; K. Bennett, A. Noel and client (1.6); email to CFO/COO T. Schwartz (.4).	5.90	\$5,044.50
02/09/22	K. Bennett	Email Sarff/strategize re: depositions [3.3]Finalize subpoenas/attachments/depo notices for Nelson and Arradondo [1.0]Continue preparation for depositions of Seely and Defendant Bauer; continue drafting Seely outline [3.6]Prep for meeting with civil rights team tmr re: use of BWC at Bauer and Seely's deposition [1.4]Review Rule 68 offer [1.4]Discussions with team re: Rule 68 offer and plan re: discussion with Soren [.5];call with MEB re: depositions/BWC use at depositions [.4]	7.60	\$5,206.00
02/09/22	M. Betinsky	T/C with KHB re impending depositions, use of bodycam videos, strategy and planning, emails re same (.8); review offer of judgment, T/C with RB re same and messages RB/KHB/ESM re same (.4).	1.20	\$636.00

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Date	Timekeeper	Description	Hours	Fees
Total Professional Services			2,367.60	\$1,481,258.00

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
R. Bennett	Partner	548.00	\$855.00	\$468,540.00
A. Noel	Partner	101.20	\$730.00	\$73,876.00
K. Bennett	Partner	731.50	\$685.00	\$501,077.50
M. Betinsky	Counsel	606.40	\$530.00	\$321,392.00
M. Betinsky	Counsel	0.40		No Charge
E. Mignanelli	Associate	78.70	\$580.00	\$45,646.00
G. Wiessner	Associate	9.80	\$485.00	\$4,753.00
E. Mignanelli	Associate	10.80		No Charge
A. Koob	Paralegal	224.60	\$230.00	\$51,658.00
N. Adler	Investigator	20.70	\$220.00	\$4,554.00
B. Cade	Investigator	6.00	\$220.00	\$1,320.00
R. Ehramjian	Miscellaneous	1.70	\$280.00	\$476.00
C. Sullivan	Miscellaneous	15.00	\$280.00	\$4,200.00
T. Wilhelmi	Miscellaneous	0.70	\$280.00	\$196.00
P. McCaffrey	Trial Consultant	12.10	\$295.00	\$3,569.50
			Totals	\$1,481,258.00

Detail for Expenses

<u>Description</u>	<u>Amount</u>
Copies	
03/31/21 Copies - Thomson Reuters - West - West Publishing Corporation - Court document retrieval from Hennepin County, MN District CourtCommunities United Against Police Brutality v. City of Minneapolis (27-CV-19-20757)	\$195.42
Court Reporter	
10/26/21 Court Reporter - DOBY PROFESSIONAL REPORTING - DOBY PROFESSIONAL REPORTING INC - Depo of Ryan McCann	\$1,942.55
12/17/21 Court Reporter - DOBY PROFESSIONAL REPORTING - DOBY PROFESSIONAL REPORTING INC - Deposition of Matthew Severance	\$1,037.00
02/03/22 Court Reporter - DOBY PROFESSIONAL REPORTING - DOBY PROFESSIONAL REPORTING INC - Video deposition	\$652.10

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<u>Description</u>	<u>Amount</u>
of Anthony Caspers; original and one copy; reporter's appearance fee; read and sign administration fee; exhibits scanned and indexed; postage and delivery.	
Subtotal	\$3,631.65
Experts	
09/22/20 Experts - Law Enforcement Risk Management Group, Inc - Law Enforcement Risk Management Group, Inc - Retainer fee for expert witness services of Jack Ryan	\$8,500.00
01/12/21 Experts - Medicolegal-Ophthalmology LLC - Experts - Explanatory expert to review all records and imaging and develop a report for the mediation	\$2,500.00
01/16/21 Experts - Brave Choices, Inc. - Heather Marie Holt - Consultation and case summary for upcoming mediation	\$200.00
03/17/22 Experts - Medicolegal-Ophthalmology LLC - Medicolegal-Ophthalmology LLC - Final invoice - Receive Stevenson records and review; begin review and speak with Robins Kaplan IT; work on report; complete first draft and finalize.	\$4,195.00
Subtotal	\$15,395.00
Filing Fees	
10/06/20 Filing Fees - Corporate Payment Systems - Filing Fees - MN District Court	\$400.00
11/08/21 Filing Fees - Corporate Payment Systems - Filing Fees	\$100.00
11/23/21 Filing Fees - Corporate Payment Systems - Filing Fees - Courts USDC MN	\$(100.00)
Subtotal	\$400.00
Local Travel	
11/05/21 Local Travel - Marc E. Betinsky - Parking - M. Betinsky, 11/02/2021 Parking at courthouse for settlement conference	\$11.00
11/05/21 Local Travel - Robert Bennett - Parking - R. Bennett, 11/02/2021 Parking for settlement conference	\$11.00
Subtotal	\$22.00
Mediation/Arbitration	
03/08/21 Mediation/Arbitration - Weyandt Mediation, PLLC - Weyandt Mediation, PLLC - Plaintiff's portion of mediator's fee	\$2,060.00
Medical Records/Reports	
09/17/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports -Brave Choices Soren Stevenson	\$84.63
09/28/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports -Fairview Central Business Office* - Soren Stevenson	\$72.00
09/28/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports -Fairview Health Services - Soren Stevenson	\$108.04
10/05/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services - Soren Stevenson	\$52.29

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10/26/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services - Soren Stevenson	\$993.43
11/23/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports - U of M Physicians-BILLING for Soren Stevenson	\$46.28
12/30/20 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services for Soren Stevenson	\$52.29
01/11/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services for Soren Stevenson	\$753.33
01/11/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Central Business Office for Soren Stevenson	\$52.94
01/11/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services for Soren Stevenson	\$194.95
01/14/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services for Soren Stevenson	\$50.14
01/25/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Brave Choices for Soren Stevenson	\$66.73
01/28/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - U of M Physicians-Billing for Soren Stevenson	\$28.44
02/03/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - University of Minnesota Dentistry-Billing for Soren Stevenson	\$68.85
02/04/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Midwest Eye Laboratories for Soren Stevenson	\$69.32
02/04/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - University of Minnesota School of Dentistry for Soren Stevenson	\$45.01
02/11/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Midwest Eye Laboratories - Soren Stevenson	\$149.65
03/05/21 Medical Records/Reports - Sharecare Health Data Services, LLC - Sharecare Health Data Services, LLC - Medical records	\$21.47
03/26/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports	\$28.44
04/08/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Central Business Office - Soren Stevenson	\$70.39
04/15/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services for Soren Stevenson	\$491.98
05/18/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - University Anesthesia Providers, LLC for Soren Stevenson	\$82.68
06/09/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports - Brave Choices for Soren Stevenson	\$66.18
06/30/21 Medical Records/Reports - Civil Action Group - Medical Records/Reports	\$27.88

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07/14/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Central Business Office - Soren Stevenson	\$53.07
07/16/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Health Services - Soren Stevenson	\$465.53
08/06/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Hennepin County Medical Center for Soren Stevenson	\$85.60
09/16/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Central Business Office for Soren Stevenson	\$49.71
09/17/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Hennepin County Medical Center-Billing for Soren Stevenson	\$28.44
10/25/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports -Hennepin County Medical Center for Soren Stevenson	\$50.89
10/29/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Bright Eyes Vision Clinic for Soren Stevenson	\$28.44
11/19/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Hennepin County Medical Center- Billing - Soren Stevenson	\$28.00
12/06/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Brave Choices Client: Soren Stevenson	\$65.85
12/06/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Midwest Eye Laboratories Client: Soren Stevenson	\$108.66
12/14/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - M Health Fairview Client: Soren Stevenson	\$144.53
12/20/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Central Business Office* Client: Soren Stevenson	\$51.33
12/20/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Hennepin County Medical Center Client: Soren Stevenson	\$105.87
12/20/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - University Anesthesia Providers, LLC Client: Soren Stevenson	\$67.39
12/20/21	Medical Records/Reports - Civil Action Group - Medical Records/Reports - Fairview Central Business Office* Client: Soren Stevenson	\$51.33
Subtotal		\$5,061.98
Messenger Service		
01/14/21	Messenger Service - Platinum Courier Service - Messenger Service - RK to Neal Sher, MD	\$36.32
Service of Process		

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10/27/20 Service of Process - Metro Legal Services Inc. - Metro Legal Services, Inc. - Service of S&C on Chief Arradondo and City of Mpls.	\$60.00
02/02/22 Service of Process - Metro Legal Services Inc. - Metro Legal Services, Inc. - Service upon Mille Lacs County Sheriff's Office.	\$200.00
Subtotal	\$260.00
Video Depositions	
10/24/21 Video Depositions - Envision Video - Envision Video - Video depo of Ryan McCann	\$1,420.00
01/09/22 Video Depositions - Envision Video - Envision Video - videography of Matthew Severance deposition	\$890.00
02/07/22 Video Depositions - Envision Video - Envision Video - Video deposition of Anthony Caspers; thumb drive with video files.	\$530.00
Subtotal	\$2,840.00
Color Copies	
Color Copies (11,708) from 07/02/20 - 01/31/22	\$1,756.20
Photocopies	
Photocopies (3,067) from 01/14/21 - 01/31/22	\$276.03
Total Expenses	\$31,934.60